

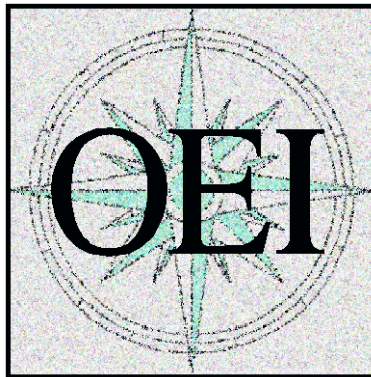
Department of Health and Human Services

**OFFICE OF
INSPECTOR GENERAL**

Office of Evaluation and Inspections

Procedures Manual

REVISED 11/20/98



JUNE GIBBS BROWN
Inspector General

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OFFICE OF INSPECTOR GENERAL

The mission of the Office of Inspector General, as mandated by Public Law 95-452, as amended by Public Law 100-504, is to protect the integrity of the Department of Health and Human Services programs as well as the health and welfare of beneficiaries served by them. This statutory mission is carried out through a nationwide program of audits, investigations, inspections, sanctions, and fraud alerts. The Inspector General informs the Secretary of program and management problems and recommends legislative, regulatory, and operational approaches to correct them.

Office of Evaluation and Inspections

The Office of Evaluation and Inspections is one of several components of the Office of Inspector General. It conducts short-term management and program evaluations (called inspections) that focus on issues of concern to the Department, the Congress, and the public. The inspection reports provide findings and recommendations on the efficiency, vulnerability, and effectiveness of departmental programs.

Procedures Committee

The Procedures Committee comprises representatives from Headquarters and the Regions. It is Chaired by Jesse Flowers, Regional Inspector General for Evaluation and Inspections, Atlanta Regional Office. Other Members of the Committee:

Peggy W. Daniel, *Program Analyst, Atlanta Regional Office*

Kevin K. Golladay, *Program Analyst, Dallas Regional Office*

Barbara J. Hyman, *Program Specialist, Headquarters Policy and Oversight Division*

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Submit suggested changes or corrections to this manual to the Committee Chair or any of its members.

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INTRODUCTION

BACKGROUND

Program inspections are one of the major tools used by the Office of Inspector General (OIG)¹ to effect positive change within the Department of Health and Human Services (HHS). They are national studies of the operation and impact of HHS programs, policies, or regulations. The Office of Evaluation and Inspections (OEI) initiates most inspections. The Inspector General, the Secretary, Deputy Secretary, an Assistant Secretary, Agency Head, or Congress can request inspections.

Program inspections focus on program vulnerabilities that could lead to fraud, waste, and abuse. Further, inspections address inefficiencies that may result in inappropriate expenditure of Federal resources. An inspection combines some of the best features of several disciplines including traditional program evaluation, survey research, operational auditing, program monitoring, compliance reviews, investigations, and management analysis. Through this process, top decision-makers can request and receive current and reliable data specifically targeted on important issues.

PURPOSE

The *Procedures Manual* provides OEI staff with guidance for conducting national program inspections. It provides basic guidance² rather than rigid rules for conducting program inspections and by no means replaces the professional judgment of OEI staff. These procedures are adequate for most inspections. However, a few may require unique approaches. Flexibility is an important quality in each national inspection. As unusual circumstances occur, headquarters and regional staffs may jointly determine appropriate procedures.

While responsibility for conducting and ensuring the quality of program inspections rests with the Regional Inspector General (RIG), all members of the organization are responsible for

¹**Appendix A** lists frequently used acronyms

²Other helpful publications include: *Implementation of the Conflict Resolution Process*, April 1990; *Standards for Inspections*; and the following *Technical Assistance Guides*

- *Focusing the Inspection,*
- *Targeting the Information Needed,*
- *Specific Sources of Information,*
- *Gathering Information,*
- *Analyzing the Information Gathered,*
- *Specific Steps for Writing an Inspection Report,*
- *Presenting an Effective Inspection Briefing; and*
- *Using Graphics Effectively.*

contributing to the quality of reports. The RIG assigns a Project Leader who is responsible for the inspection, including design, data collection, on-site visits, data analysis, report writing and briefing presentations. The headquarters Program Specialist serves as both a facilitator and a technical advisor to the Project Leader throughout an inspection. They provide general review and comment on the design, data collection instruments, working draft, draft, and final reports, and other inspection products. They also coordinate activities such as Entrance and Exit Conferences.

Essentially, these procedures reflect a decentralized national inspection process, with most staff resources in the field and a relatively small headquarters staff. Inspections are collaborative, team efforts by those who conduct the data collection, analysis, and report writing, and those who guide and review the written and oral inspection products.

KEEPING THE MANUAL CURRENT

A team of OEI staff representing headquarters and regional offices comprises the OEI Procedures Manual Committee. The Committee meets semiannually (usually in February and August, to discuss revising and/or modifying the *Procedures Manual*). Prior to the semiannual meetings, a formal request for suggestions and changes goes forth to all OEI staff. The Committee reviews all suggestions for manual changes.

Submit suggested changes to this Manual to the Procedures Committee Chair or any of its members.

Inspector General Authority for Access to Records

The Inspector General authority is specified by Public Law 95-452 (5 U.S.C. Appendix 3), as amended by Public Law 100-504. Section 6(a)(1) of 5 U.S.C., Appendix 3 gives the Inspector General access to any records to which the Secretary, Department of Health and Human Services has access. Section 6 (a)(4) of 5 U.S.C., Appendix 3 gives the Inspector General subpoena authority. Refer to **Appendix B** of this manual for the text of this section of the Inspector General Act.

OEI QUALITY ASSURANCE PROCESS

The Review Team Process

Once a region sends in an inspection product, such as a design, working draft, draft, or final report, the Project Leader contacts the Program Specialist to decide whether to schedule a review team meeting. The Program Specialist is responsible for scheduling the meeting and notifying the participants. We typically conduct this meeting by teleconference. The duration of the call depends upon the type and quantity of changes discussed.

The purpose of the review team meeting is to decide if a product is ready to be used internally or distributed to external users.

As a practical matter, the review team meeting provides an opportunity for feedback to the region on virtually any aspect of a product which non-regional review team members feel could increase its clarity or impact. The review team meeting serves as an opportunity for the region to obtain feedback prior to releasing a product to an operating division (OPDIV) or staff division (STAFFDIV). Review team members reach consensus on needed changes and approximate time frames. While a product may require only one review team meeting, it is typical to hold several before approving a product for release. Regional staffs are strongly encouraged to consult with Program Specialists regarding the content of a product before sending in the document for a review team meeting.

The review team is typically composed of the following OEI staff

- Deputy Inspector General,
- Senior Advisor to the Deputy Inspector General,
- Program Evaluation Division, Director,
- Program Evaluation Division, Associate Director,
- Program Specialist,
- Technical Support Staff representative, and
- Project Team (including the Project Leader and Technical Statistical Analytical Representative (TSAR) regional members).

It is the region's responsibility to make all changes agreed upon in the review team meeting and resubmit the report for review as soon as possible.

WORK PLANNING

THE OIG WORK PLANNING PROCESS

The OIG work planning process is for self-generated work plans. It does not address that portion of the OIG's work initiated from external requests, mandated work, or items that surface outside the normal work planning cycle. As stated in the OIG Strategic Plan, the OIG Work Plan must consider many factors

- the breadth and results of past and current oversight activities from within and outside the OIG,
- Administration, Secretarial, and congressional priorities, goals, and related shifts in these areas with respect to HHS program and financial operations,
- the extent program operations and policies affect beneficiaries and other HHS customers,
- whether particular HHS programs are scheduled for reauthorization,
- the amount of a program's or agency's Federal expenditure responsibility and concentration of funds,
- the vulnerability to fraud or abuse within a program, based upon preliminary research into program controls, management information, and the potential financial gain incentive by program users, beneficiaries, providers, contractors, grantees, or others,
- the potential for improvements in program efficiency and effectiveness based upon preliminary research,
- the extent to which involvement in a particular area fulfills the OIG mandate (e.g., a new, substantially changed, or particularly sensitive program or activity), and,
- the public view concerning how well programs meet their needs.

KEY ELEMENTS OF OIG WORK PLANNING

The **OIG Universe of HHS Programs** comprises all programs, outlays, activities, or functions that the OIG could review. The OIG develops profiles of the universe from internal and external reference materials, such as departmental budgets, legislative initiatives, etc., which serve as a focal point in the planning process. During development of the annual OIG Work Plan, OEI considers providing adequate coverage to the most significant elements of the universe. Complete coverage of the universe during a planning cycle is not feasible.

Issue Areas are broad conceptual issues with the greatest potential for significant impact on HHS program services, and costs. They often span several categorical program areas. They provide a focus for work planning over a 12-35 month period. To identify new issue areas, we screen the OIG universe against the factors listed on the previous page (the bullet items), to detect the most significant issues on the horizon. The OIG staff may need to conduct significant research on these issues to develop an understanding of emerging policy and programmatic details. We develop the issue areas jointly among the components, with the cooperation and participation of OPDIV senior and program staff.

Work Plan Proposals are timely and focused, and primarily driven by the identified issue areas. OIG Work Plan proposals will generally be component-specific, although their development will require collaboration across the OIG, and will often involve active discussion with the OPDIV. We may occasionally develop OIG Work Plan proposals independently of an issue area should a specific, but narrow, need arise which warrants OIG efforts (see page 7 for proposal format and **Appendix C** for examples.)

STEPS AND TIME LINE

Each step in the OIG work planning process requires involvement by all components and discussions with OPDIV representatives to ensure a comprehensive and responsive Work Plan. In summary, the seven steps are

- Develop and document the OIG universe of programs. (Includes performing the Audit Risk Assessment and considerable research, using all available avenues of information such as legislation, discussions with OPDIV staff, information from the private sector, including various consumer groups, etc.) **October - December**
- Develop issue areas. (Coordinated by PED staff and Office of Audit Services (OAS) divisions, and resulting in agreement of issue areas for each OPDIV.) **December - February**
- Prepare Work Plan Proposals. (Involves all staff--collaboration and cooperation among components, and discussions with OPDIVs are encouraged.) **February - March**
- Review proposals and provide feedback. **April**
- Coordinate the draft work plan proposals. (Distribute draft to other OIG components for comment.) **May**
- Share the draft work plan with departmental agencies for comment. **June - July**
- Publication of the OIG Work Plan for fiscal year. **September**

A table showing the steps in more detail is on the next page.

**OFFICE OF INSPECTOR GENERAL
FISCAL YEAR WORK PLAN TIME LINE**

Date	Assignment
Late January	Data call for OIG Work Plan issues.
Mid February	Input due on OIG Work Plan issues.
1st Week of March	Meetings held with OPDIVs on issue areas. Joint meeting with components on OIG Work Plan issues. IG/DIG approval of issue areas; briefing if desired.
Late March	OIG Work Plan data call to components.
April/May	Components develop work plan proposals, reconcile differences and duplications at staff level, and jointly meet with OPDIVs/STAFFDIVs.
Early May	Component input to their respective HQ groups.
Mid May	OI/OEI/OCIG input to OAS ³
Early June	Initial OIG Work Plan draft forwarded to components for review.
Mid June	Component comments to OAS on initial OIG Work Plan draft.
Mid June	Clearance of the second OIG Work Plan draft and transmittal memo to OPDIVs/STAFFDIVs by Deputy IG and IG - briefing if desired.
Late June	Second OIG Work Plan draft forwarded to Secy/Deputy/OPDIVs/STAFFDIVs for comment.
Late July	OPDIV/STAFFDIV comments due; distributed to components for review and analysis.
Early August	Meetings with senior OPDIV/STAFFDIV officials to resolve comments, as needed.
Mid August	Component responses to OPDIV comments due.
Mid August	Provide IG with a summary of OPDIV/STAFFDIV input and suggested revisions - briefing if desired.
Mid/Late August	Final mark up of OIG Work Plan from components due.
End of August	Final draft for executive approval - briefing if desired.
Early September	Final OIG Work Plan sent for printing.
Mid September	Final OIG Work Plan received from printing.
End of September	OIG Work Plan distributed.

³ OI is the Office of Investigations. OEI is the Office of Evaluation & Inspections. OCIG is the Office of Counsel to the Inspector General. OAS is the Office of Audit Services.

THE OEI WORK PLANNING PROCESS

In the spring of each year, the Program Evaluation Division (PED) Director sends a memo to the regional offices and the PED staff as part of the request for work planning proposals. This memo provides reminders of current strategic issues, identifies emerging issues, estimates volume of proposals needed, and conveys evaluation criteria for proposals in the upcoming review cycle.

The Work Planning Committee [consisting of the Deputy Inspector General (DIG), the Senior Advisor to the Deputy Inspector General, and the PED Director] identifies evaluation criteria for the proposals. Examples of such criteria include, but are not limited to

- timeliness,
- relevance to strategic issues,
- client/requestor,
- schedule,
- methodology,
- expected results, including potential savings,
- previous work in the area,
- OPDIV coverage, and
- program coverage.

Proposal Format

Final proposal write-ups should provide sufficient information for the Work Planning Committee to make decisions and for the regional offices to bid on accepted proposals (see **Appendix C** for examples). While the format may vary, it must include the following information:

1. **Title:** Capture the essence of the inspection as succinctly as possible. This part of the proposal will be most visible, so a concise, clear title is important.
2. **Issue Area:** Identify the specific issue area being addressed by the proposal.
3. **Objective:** In one sentence of three lines or less, state precisely the focus of the inspection. Use the infinitive form (“To identify vulnerabilities of . . .”) This sentence must be simple, precise, and clear enough for a well-informed generalist (such as the Secretary, Deputy Secretary, or Assistant Secretary for Legislation) to understand. It is unlikely that any other document will contain both this and the longer description outlined below. Therefore, this section needs to be completely self-contained.
4. **Description:** The description normally consists of one or two sentences on each of the following topics, although we can omit any of these if the information is well-known, obvious, or not pertinent. We can also change the order if the resulting description is easier to understand.

The Program. Begin by identifying and describing the program or provision of law that is the subject of the inspection. If the program or provision was recently enacted into law, included in a regulation, or put into place because of a specific administrative action, state this condition and identify the law, regulation, or administrative action.

The Problem. If a known or suspected problem or concern has led to the inspection, state what it is. (**Note:** When inspections are exploratory, without a preconceived notion of a problem, skip this part.)

Focus of the Inspection. State the objective of the inspection. Show how the proposed inspection will contribute to the resolution of the problem. This statement might be very similar to the one-sentence objective statement previously mentioned, but may need more elaboration. If appropriate, state whether the inspection objectives(s) include identifying cost savings, i.e., a cost avoidance and/or a cost recovery. Cost avoidance is a potential future savings. Cost recovery is a financial adjustment applicable to funds spent in prior periods.

Expected Use of Inspection Results. Specify how the inspection results will be used. For example, say that they will help an OPDIV take corrective action on a problem. If an OPDIV or STAFFDIV official requested the inspection, say so. If it is being prepared for consideration by a task force, identify it.

Potential Impact. All work plan proposals will include a brief description of the potential impact of the proposed study using terms as shown in “Measuring Qualitative OIG Impact” (see **Appendix D** for language and formatting examples).

5. **Methodology:** Propose a methodology that will accomplish the objective and identify the causes of the problem. Be as specific as possible, mentioning potential statistical analysis, types of a survey (e.g., telephone or mail out), etc.

Include other factors, if known or appropriate, such as requestor, schedule (e.g., a window of opportunity, required time frames), expected outcomes/results (e.g., cost savers, congressional hearings, ground-breaking area), products, and audience.

(See **Appendix D** - Checklist for Developing Impact-Oriented Work Plan Proposals.)

Proposal Review and Feedback

The process for reviewing work plan proposals and establishing the priorities of approved proposals is twofold: an initial decision by the PED Director and a final decision by the Work Planning Committee.

Submit all proposals to the PED Director. The PED staff, using the criteria specified, will screen proposals and decide which proposals to forward to the Work Planning Committee. They use review forms to capture the results of PED staff and the Work Planning Committee's reviews. Submit copies of the completed forms to the Senior Advisor to the Deputy Inspector General as an aid to the ongoing evaluation of the Work Planning process.

The Work Planning Committee reviews proposals sent forward by PED staff. It determines which items they accept into the OIG Work Plan, along with their priority ranking. The PED Director returns proposals not selected to the originators with an explanation addressing why they declined to accept them.

Quarterly Reviews

Each fiscal quarter, the Work Planning Committee reviews all unassigned inspections and those assigned to regions but not yet started. In the meetings held in January, April, and July, the Committee primarily addresses individual work plan proposals. However, in the October meeting, the Committee focuses mainly on future projects by examining strategic issues. They have consulted with OPDIVs regarding comments to the OIG Work Plan. As a result of this activity, the Committee can propose inspection topics for OEI to initiate in the next few months to a year.

Assignment of Inspections

When the region is ready for additional inspections, the RIG/DRIG contacts the PED Director and provides a list of work plan topics of interest. The PED Director assigns inspections to the regions. **Note:** Regional offices must start assigned inspections within 60 days.

PROGRAM INSPECTION

PREINSPECTION

Preinspection is an important first step for any program inspection. Its purpose is to identify issues, available data, respondents, and settings; define the scope; and determine methods of data collection and analysis to be used in the assigned inspection. It narrows the focus and pinpoints the areas of concentration. Preinspection steps include

- coordinating with the PED Associate Director, Program Specialist, Technical Support Staff (TSS), and the person(s) who submitted the proposal,
- reviewing existing data, including possible visits to sites,
- holding discussions with program officials and others knowledgeable about proposed inspection issues, and
- conducting literature searches (including OIG and GAO reports).

The RIG, in collaboration with the Senior Advisor to the Deputy Inspector General and the PED Director, is responsible for advising whether the study is worth continuing at the end of preinspection. If the proposal should not continue to a full national inspection, the RIG should recommend dropping the inspection or taking an alternative action.

Note: Some preinspection work described in this section may occur as part of the OEI work planning process.

Some specific preinspection tasks include the following

- The RIG assigns the inspection to a Project Leader/Program Analysts and negotiates with other RIGs (if they need regional support) for the necessary number of program analysts to conduct the inspection. Support regions may be involved in preinspection, field work, and/or analysis.
- The RIG or Deputy Regional Inspector General (DRIG) contacts the PED Director who in turn assigns a PED Associate Director and a Program Specialist to the inspection and informs the region of the selections.
- The Project Leader sets up a work paper file (see section entitled “**Work Papers**” and **Appendix L**).
- The Program Specialist obtains an inspection control number from the secretary to the DIG and informs the region. OEI requires a separate inspection control number for each planned inspection report.

- The Program Specialist should contact organizations such as other OIG components and the General Accounting Office (GAO) to learn if they are conducting related work on the topic, have done related work in the past, and to share results. The Program Specialist should share the results of the contact with the Project Leader.
- The Project Leader and Program Specialist should identify other related studies within or outside the Department. In addition, they should identify relevant pending or recently enacted regulations or legislation.
- The PED Director or Program Specialist sends a start notice of the proposed program inspection (see **Appendix E**) to the appropriate OPDIV/STAFFDIV. **Usually, no one contacts OPDIV staff--or State program officials--prior to releasing the start notice. In circumstances where contact is necessary, the Project Leader should notify the Program Specialist.** The date of the start notice is the start date of the inspection. We may send this notice via electronic mail. If you prefer sending via hard copy, use OIG memorandum paper.
- As appropriate, the Project Leader and/or the Program Specialist discuss the overall scope of the study with OEI's Technical Support Staff (TSS). **Appendix F** summarizes procedures for requesting information or assistance from TSS.
- After discussions between the Program Specialist and the Project Leader, the RIG and PED Director determine a due date for the program inspection design.
- The Program Specialist consults with the Project Leader and arranges for the Entrance Conference with OPDIV staff. Most OPDIVs have a liaison with the OIG (generally called "Audit Liaison"). The Entrance Conference provides an important opportunity for soliciting and incorporating OPDIV interests and concerns. (Provide a copy of the draft design to the OPDIV/STAFFDIV prior to the Entrance Conference).
- The Project Leader and the Program Specialist develop a list of contacts such as STAFFDIV and OPDIV officials who may have critical information about the issues.
- The Project Leader, Program Analyst(s), and/or Program Specialist arranges and attends meetings with other appropriate officials. These meetings help to define the inspection, identify critical issues, and determine the current state of the program. Sometimes, meetings take place after preinspection is completed and suffices as an Entrance and Design Conference.

- The Project Leader reports any possible “material weakness” to the RIG/DRIG for further development. This may occur at any stage of the inspection. (See **Appendix G** for the definition of “material weakness” and a detailed explanation of the procedure.)
- The Project Leader collaborates with the Program Specialist and recommends to the RIG whether to continue with the program inspection and, if so, which central questions the inspection will address. If the RIG believes that they should curtail further inspection activity, he or she consults with the PED Director. If we drop or cancel the inspection, PED notifies the OPDIV’s Audit Liaison staff and makes appropriate adjustments to the OEI tracking system, work plan documents, etc.
- The Program Specialist and the Project Leader will jointly contact the Office of Counsel to the Inspector General (OCIG) for information and advice when the inspection involves legal issues, or if they need subpoenas to collect data or information.

DESIGN

The next step is to design the full program inspection. The design clearly defines the issues and scope and describes how to conduct the program inspection. A design includes the following sections.

Purpose

States what the inspection intends to accomplish. It should be a brief action statement clearly showing why we are performing the inspection.

Objectives (optional)

Indicates more specifically how we will achieve the purpose of the inspection. Each objective should be a brief action statement.

Note: See *Technical Assistance Guide 1, Focusing the Inspection*, to help specify the inspection issue areas. *Technical Assistance Guide 2, Targeting the Information Needed*, helps to decide the process of the inspection activity.

Background

Provides relevant contextual information and a framework for viewing the major issues addressed in the inspection. It should close with a clear indication of why the inspection is

important. This section should include information about the following, as they apply to the inspection

- the HHS program being studied (including whether States may be affected),
- special departmental interests, such as Secretarial initiatives,
- relevant stakeholders and any particular interests of theirs,
- relevant legislative or regulatory history,
- explanation of any unfamiliar terminology,
- relevant prior evaluation work, and
- OIG work (including OI and OAS) in this area.

Audience

Identifies groups that will receive copies of the final report. We are not looking for specific individuals, but rather primary audiences that would benefit from knowing the study results. (The Project Leader should maintain a list of potential clients for this inspection product.)

Scope

Discusses the parameters of the inspection by identifying the areas the inspection seeks to cover. This section should refer to the specific focus of the inspection and any limits that affect areas of inquiry that the inspection will not pursue.

Issues

List the major questions the inspection will attempt to answer. The issues form a core of questions around which the rest of the inspection design revolves. These questions are more specific than the objectives and, as such, often form the basis for developing discussion guides and an analysis plan. We should organize the questions in a few discrete clearly identified categories.

Methodology

Discusses how we will execute the inspection. It should clearly identify and explain each source of data to be used in the inspection. This section should refer to the specific information listed below as it applies to the inspection

- preinspection work,
- data to be collected for the inspection,
- sources of data,
- method of data collection,
- identifying respondents,
- sampling procedures,
- methods to ensure reliability of record and interview data, whether computerized or manual,
- cost avoidance and/or cost recovery techniques, if applicable,
- name(s) of software program(s) to be used in data collection and analysis, and

- contractor assistance.

If we anticipate cost avoidance or cost recovery, we should mention and consider this point when developing the methodology.

Analysis Plan

The analysis plan includes two main components.

Linking data sources with objectives or issues: Specify the data sources for each objective or issue category, which serve as the basis for the findings. This process should assure that sufficient information is available to arrive at conclusions concerning the stated objectives and issues.

Analyzing the data: Specifies preliminary plans for analysis of data collected during the inspection. This section identifies the duration and type of any trends, comparisons, and the scope and nature of any examination of case studies. Where relevant, this section shows use of data analysis techniques, such as multivariate analysis, modeling, or content analysis. (See *Technical Assistance Guide 5, Analyzing the Information Gathered*, for definitions of these terms.)

Products

Identifies how inspection results will be presented. Program inspection products typically take the form of inspection reports. If we plan multiple reports, note that point in this section.

The following sections on Budget and Staffing, Schedule, and Inspection Impact are placed on separate pages. These sections are not disseminated outside of OEI.

Budget and Staffing

Includes estimates of the inspection cost and identifies OEI staff conducting the inspection. The estimate includes the cost of full time equivalents (FTEs) assigned to work on the inspection, including both regional and headquarters staff. Include costs incurred during preinspection work and an estimate of all expected costs for the inspection, such as

- field work,
- briefings,
- printing,
- postage, or
- contractor work.

Schedule

Lists key milestones from preinspection through final report issuance. Examples include

- complete preinspection,
- design approved,
- Entrance Conference,
- complete field work,
- complete data analysis,
- submit working draft to Headquarters,
- Exit Conference,
- submit draft report for IG Signature, and
- submit final report for IG Signature.

Inspection Impact

In conjunction with the design, attach a 3 column potential impact report (see **Appendix D** for language and formatting examples). The potential impact will be discussed at the time of the design conference.

SUBMITTING DESIGN

The Project Leader and Program Analyst staff prepare the design by the scheduled date. When the design calls for sampling, the Project Leader works with OEI's Technical Support Staff (TSS) to develop an appropriate sampling plan. The RIG submits the design to the review team, and the secretary to the DIG by electronic mail. **Do not electronically mail a copy of the design directly to the DIG.** The Project Leader should contact the secretary to the DIG by telephone to request that these documents be downloaded, printed, and given to the DIG, the Senior Advisor to the Deputy Inspector General, and the PED Director. If the secretary to the DIG is unavailable, then the Project Leader should contact another headquarters' secretary to request downloading of these documents. **Do not express mail designs for review team meetings.** The review team consists of

- Deputy Inspector General,
- Senior Advisor to the Deputy Inspector General,
- Program Evaluation Division, Director,
- Program Evaluation Division, Associate Director,
- Program Specialist,
- Technical Support Staff representative, and
- Project Team (including the Project Leader and TSAR regional members).

The Program Specialist coordinates review of the design by the review team and other OIG components, STAFFDIVs, and OPDIVs, when appropriate. If there are debatable or unresolved issues regarding the design, schedule a Design Conference.

If, as a result of the review and subsequent discussion, changes are needed, the Project Leader should revise the design.

The RIG sends the approved design to all RIGs, the review team, the Special Assistant to the DIG and the secretary to the DIG. Generally, the Program Specialist will provide a copy of the design to the OPDIV 2 weeks before the Entrance Conference. **Note:** Exclude the Budget and Staffing, Schedule, and Inspection Impact sections.

ENTRANCE CONFERENCE

The purpose of the Entrance Conference is to solicit OPDIV/STAFFDIV officials' support for the program inspection. In doing so, the Project Leader should request comments on the design. Further, the meeting is intended to reveal any potential weaknesses in the inspection issues and methods.

The Project Leader should be well versed in the planned issues and methods of the design to facilitate the Entrance Conference presentations and to be able to respond to questions by the attendees. Preparation for the meeting could include visual aids such as slides, charts, etc.; draft discussion guides; and knowledge of data systems and files needed to complete the inspection work. The Project Leader should coordinate presentation equipment needs with the Program Specialist.

DATA COLLECTION/FIELD WORK

Program inspections require the collection of various types of data or information. The Project Team collects the information needed to analyze each issue. We can conduct some inspections without extensive travel for data collection. These may involve document reviews, data reviews, and/or telephone and mail surveys. Many program inspections also require on-site visits. Data collection techniques include

- conducting on-site discussions/observations,
- inspecting original documents,
- collecting data from computer systems or written records,
- matching files against each other,
- reviewing guidance and procedures,
- conducting phone surveys,
- conducting e-mail/mail/fax survey questionnaires, and
- conducting focus groups.

The Project Leader coordinates logistics and makes staff assignments to gather information and carry out field work/data collection. If, during field work, a Program Analyst discovers or is told of improprieties that they could construe as potential instances of criminal fraud and/or abuse, the Analyst immediately notifies the Project Leader. The Project Leader consults with their RIG/DRIG about referral of the potential fraud or abuse issue to OI.

The Project Leader maintains contact with team members while in the field to advise of changes in data collection strategies, to stay on top of unexpected developments, and to monitor field work to assure satisfactory progress and appropriate data collection.

When individuals or agencies fail to release records or documents accessible to the IG by statute, the Project Leader notifies the RIG. The RIG consults with the Office of Counsel to the Inspector General (OCIG) to initiate an administrative subpoena.

The Project Leader communicates weekly or biweekly with the Program Specialist to keep him or her apprised of inspection status and any factors that may require deviation from the approved design. The Project Leader may ask the Program Specialist to participate in field work or data collection.

Data Collection Instruments

Program inspections often require collecting information systematically from experts, program administrators, beneficiaries, Federal, State and local officials, and others. Often, data collection instruments (DCIs) are used to assure that we have addressed all relevant issues during discussions with respondents and have collected all the necessary data. These instruments vary and are unique to each program inspection. An effective instrument should be focused and concise, yet thorough, logically organized, and tailored to the respondents. The Project Leader and Program Analyst are responsible for designing, pretesting, and revising the DCIs. When they finalize the DCI, the Project Leader may need to submit it to the Senior Advisor to the Deputy Inspector General.

The procedures for approval of DCIs is currently being prepared by the DIG.

DCI Training

Once the Project Leader has finalized the data collection instruments, team members must be adequately prepared to carry out their responsibilities. The Project Leader develops a training program and conducts training for lead and support regions. All team members involved in the inspection should participate in the training. Sometimes, the Project Leader may condense training to a series of individual staff meetings or conference calls. The training may include

- an introduction of team members,
- the purpose of the program inspection,
- relevant program background,
- specific inspection issues,
- the program inspection design,
- the roles and responsibilities of team members,
- a description of the settings and respondents,
- practice with data collection instruments,
- a review of analysis and reporting plans, and
- logistics of site scheduling and respondent access.

The Program Specialist provides information and resources as necessary and sometimes attends the training.

Data Requests

We use both primary and secondary data as part of our inspections. Information we obtain directly is primary data. Information collected by others is secondary data. It is important to consult with TSS during the design phase of the inspection when planning analysis of either type of data. For secondary data, TSS verifies that the data needed will not duplicate previous OEI requests. In addition, if we do not have access to the data file, TSS will assist or will prepare and submit the request for data and needed documentation. Contact any TSS staff person for assistance. They will route the data request specifications to our OEI Authorized Point of Contact, Brian Ritchie. Obtain additional clarification and guidance by contacting Brian Ritchie at (410) 786-3146.

DATA ANALYSIS

One of the most important steps in any program inspection is analyzing the information collected to produce accurate and reliable inspection findings and recommendations (see *Technical Assistance Guide 5, Analyzing the Information Gathered* for additional advice).

The Project Leader, with the Program Analyst and the regional TSARs, should determine the appropriate methods of data analysis. The regional TSARs serve as consultants/advisors to the Project Leader for tools and methods of data analysis. The Technical Support Staff (TSS) should also be contacted to answer any questions and to review the data analysis methods. *The Evaluator's Statistical Handbook Analytical Tools Using SAS®*, contains additional analytical guidance and describes various statistical methods and analysis using SAS® computer software.

The regional TSARs, with the Project Leader, normally contacts TSS. The TSS will assist the Project Leader and the regional TSARs in establishing the degree of reliance that can be placed on the entity's computer-based data systems. Since this determination affects the sampling plan, it should be discussed in the **Methodology** section of the inspection design.

The lead region conducts the analysis by, for example, systematically reviewing the information recorded during site visits, using computer software to analyze quantitative information from mail questionnaires, record reviews, and/or examining files. They can manually review and/or code qualitative information by type of response for computer software analysis.

If, after completing data analysis, it appears that the inspection has detected suspected criminal/civil fraud activity, the Project Leader should consult with the RIG/DRIG for referral to OI.

The region may also formally request assistance from TSS (see **Appendix F**) to analyze and project data, findings, cost savings, and validate appropriateness of proposed analytical methods.

Reliability of Computer-based Data

To maintain credibility, OEI must take reasonable steps to assess the reliability of pre-existing computerized data used as the basis for inspection findings and recommendations. Many inspections either begin with a computerized sample selection or are based entirely on analyzing data extracted from computerized records not under OEI's direct control. Project staff should not assume that such computer extracts or sample selections are complete or that they accurately reflect the universe of people or transactions being studied.

For OEI purposes, data reliability means the degree to which data extracted from computer records for a program inspection completely and accurately reflect the individuals or transactions being studied. This is a relative concept, one that recognizes that data with errors may still be usable, if the errors are not of a magnitude that would cause a reasonable person to doubt findings or conclusions that are based on the data.

To provide reasonable assurance of computerized data reliability or to notify readers that reliability was not determined

- Identify prior reviews by OIG, GAO or by system managers attesting to the computer system and data reliability,
- Review the data dictionary, if it exists, for the database to assure a full understanding of the relevant data elements' structure, content, how the elements are derived, and their interrelationships before requesting data extractions,
- Discuss data extraction criteria with TSARs and/or TSS to ensure that the criteria for the extraction will produce the data needed,
- Obtain frequency counts of critical data elements to determine if the data selection criteria are providing the information anticipated and ask the TSARs and/or TSS to review the data,
- Conduct data accuracy tests to ensure that required data elements have been provided and are in the expected format [e.g., Health Insurance Claim Numbers are nine digits with one or two alpha suffixes; names are character (alphabetical) fields; dates of birth are in the MMDDYY format, etc.],
- Obtain detailed printouts for a sub-sample of records included in the data extract to confirm that the extraction produced the types of records sought and the required information from those records,
- Obtain source documents, e.g., claim folders, for a sample of extracted records to determine the validity of the data contained in the automated records, if the data reliability is questionable, and

- Include a statement in the **Methodology** section of draft and final reports describing the extent of reliability testing performed and our confidence in the data used. If serious data errors exist, consider a separate finding of this fact in the inspection report or in a related management advisory report.

Adapt the following language to specific inspections to report the results of data testing:

Reliable Data Used

To conduct this inspection, we relied on computer-based data contained in [cite sources of data]. We tested the data extracted from the system and concluded that the data are sufficiently reliable to support our findings and recommendations.

Questionable Data Supported by Other Evidence

To conduct this inspection, we relied on computer-based data contained in [cite sources of data]. Our tests of the data revealed inconsistencies, omissions, or other errors. However, when considered in context with other available evidence, we believe the findings and recommendations in this report are valid.

Note: When data are unreliable and not supported elsewhere, we should not use it as a basis for any of the findings in OEI reports.

Reliability Not Determined

To conduct this inspection, we used computer-based data contained in [cite sources of data]. We did not, however, conduct tests to determine the data's reliability because [explain reason]. When considered in context with other available evidence, we believe the findings and recommendations in this report are valid.

REPORTING

WORKING DRAFT REPORTS

The working draft report is the first rough draft and may contain gaps due to incomplete data analysis. A story conference forms the foundation for the working draft. This version is typically used for the Exit Conference, which is where inspection results are presented to OPDIV staff.

Story Conference

We hold story conferences to discuss tentative results of the program inspection. The value of the story conference is that the entire team, including headquarters members, has an opportunity to discuss program inspection results and contribute to developing a story line and potential recommendations. The discussion usually occurs when data analysis is nearly complete and before drafting the report. Typically, story conferences occur with only an outline to guide the discussion.

To schedule a story conference, the Project Leader coordinates with the Program Specialist. The story conference is most effectively done in person, with all parties in the same room, but it may also be accomplished by teleconference, if appropriate. At this conference, the regional project team and the review team discuss potential findings and recommendations, reach a consensus, and then assign the relative priority for them.

In addition, story conference participants finalize the list of primary clients for the report and refine the working draft due date.

Working Draft Report Format and Contents

The Project Leader and Program Analysts(s) are responsible for writing the working draft report. Format all reports with the ALT Q macro. The ALT Q macro is an OEI in-house designed macro for formatting reports and therefore ensuring standardization (**Appendix H** contains examples of report covers and section formats).

Experimental Report Formatting

In order to maximize OEI impact, we are currently using an experimental report format, as detailed by a memorandum from the Deputy Inspector General dated 09/22/98. Regions should, until further notice, follow these formatting guidelines for all new working draft reports submitted after the date of this memorandum.

Traditional Report Formatting

The following instructions will be deleted from this manual, once the experimental report formatting test is completed and approved as a permanent process (see page 21).

Format all reports with the ALT Q macro. The ALT Q macro is an OEI in-house designed macro for formatting reports and therefore ensuring standardization (**Appendix H** contains examples of report covers and section formats).

The working draft report should contain the following elements:

COVER & INSIDE PAGE

Use the ALT Q macro to produce the working draft report cover in OIG style. Complete the inside page information concerning the regional office, RIG, and the region and headquarters staff.

TITLE PAGE

The title page and cover are identical. However, the ALT Q macro will not create a second cover page within the same document, therefore, copy and insert the cover page.

EXECUTIVE SUMMARY

Use the ALT Q macro to create the heading. The executive summary is a brief version of the report. It should almost always be only one to two pages long, should be easy to read and understand, and may contain the four sections described below.

PURPOSE

A brief action statement that clearly states why we did the inspection.

BACKGROUND

Establishes sufficient framework to understand the findings. **Note:** The **EXECUTIVE SUMMARY** **does not** have a **METHODOLOGY** heading. The methodology should appear as a separate paragraph under the **INTRODUCTION** section.

FINDINGS

Generally displayed in either one of two styles, depending on the type of finding. These two styles will handle most reports.

- ▶ Bulleted list. One sentence findings, listed one after the other, not in bold.
- ▶ Subheading (bold, italic). Each finding is presented as a subheading, followed by a brief explanatory paragraph in normal text.

	A different customized style may be more appropriate in some cases. Note: Findings should begin on the first page of the EXECUTIVE SUMMARY .
RECOMMENDATIONS	If applicable, are proposed actions based on findings and observations of the inspection. In certain instances the inspection team and review team may jointly choose another title for this section (e.g., Options or Conclusions).
TABLE OF CONTENTS	Use the ALT Q macro and follow prompts.
INTRODUCTION	Use the ALT Q macro.
PURPOSE	A brief action statement that clearly indicates why we did the inspection (usually one sentence).
BACKGROUND	A brief summary of the conditions existing at the time we initiated the inspection. It may include: program purpose, operations, and funding; affected parties; relevant congressional or public concerns; and other items that set the framework for the inspection.
METHODOLOGY	<p>A brief description of the manner in which we conducted the inspection. This section should specify the type(s) of data collection used, the sample selection criteria and confidence intervals, and the type of analysis conducted. It should also specify the steps taken to test for the reliability of pre-existing computer-based data and the degree of confidence we have in its reliability (see page 19). Include language specifying the time period of the inspection.</p> <p>At the end of this section, place the following statement: We conducted this inspection in accordance with the <i>Quality Standards for Inspections</i> issued by the President's Council on Integrity and Efficiency.</p>
FINDINGS	Use the ALT Q macro. The FINDINGS section should provide an objective discussion of the results of the inspection. In certain instances the inspection team and review team may jointly choose another title for this section (e.g., Observations).

RECOMMENDATIONS

If applicable, use the ALT Q macro. The **RECOMMENDATIONS** section should propose actions based on findings and observations of the inspection. In certain instances the inspection team and review team may jointly choose another title for this section (e.g., Options or Conclusions).

If the recommendations consist of a simple list without further elaboration, use a bulleted, unbolded list format.

APPENDICES

Use the ALT Q macro and, when prompted, type the appropriate appendix letter (e.g., A, B). The **APPENDICES** are used to convey essential information that is too voluminous or technical to include in the body of the report. Include in Appendices such things as flow charts describing operational processes, tables summarizing significant data analyzes, and detailed descriptions of the statistical methodologies together with the resulting cost projections.

For additional guidance on report writing, refer to the *Write to the Point* manual and *Technical Assistance Guide 6, Specific Steps for Writing an Inspection Report*.

Submitting Working Draft Reports for Review Team Meetings

The RIG submits identical working draft report packages **via electronic mail** to the review team, and the secretary to the DIG. **Do not electronically mail a copy of the working draft report package to the DIG.** The Project Leader should contact the secretary to the DIG by telephone to request the documents be downloaded, printed, and given to the DIG, the Senior Advisor to the Deputy Inspector General, and the PED Director. If the secretary to the DIG is unavailable, the Project Leader should contact another headquarters secretary to request downloading of these documents. **Do not express mail working draft reports for review team meetings.** The review team consists of the

- Deputy Inspector General,
- Senior Advisor to the Deputy Inspector General,
- Program Evaluation Division, Director,
- Program Evaluation Division, Associate Director,
- Program Specialist,
- Technical Support Staff representative, and
- Project Team (including the Project Leader and TSAR regional members).

Each working draft package consists of

- a cover memo (**Appendix I**),
- the working draft report, and
- potential impact statement (**Appendix D**).

The potential impact statement previously submitted with the design should be updated to reflect potential impact resulting from data collection and analysis. In the future the region will additionally input this information to the Impact Documentation System (IDS).

Review Team Meeting - Working Draft Report

Upon receipt of a working draft report, the Program Specialist arranges a review team meeting to ensure the quality of report products as outlined on page 2 of this manual. Review team comments are advisory to the region. Inspection reports are the product of a collaborative effort involving regional and headquarters staffs. While the RIG has the responsibility for ensuring the quality of the inspection, the RIG and the project team should seriously consider headquarters comments. If major disagreements remain, the RIG and PED Director should settle them before submitting the draft report. The DIG will settle unresolved issues.

Exit Conference

When the review team has discussed and agreed to appropriate changes on the working draft report, the Program Specialist arranges for an Exit Conference (meeting) with the affected OPDIVs/STAFFDIVs. The Program Specialist also sends those components copies of the revised working draft report. **Note:** Be sure that the working draft report cover is generated using the ALT Q macro and marked “WORKING DRAFT.”

The Exit Conference provides OPDIVs/STAFFDIVs an opportunity to verbally comment on the working draft. After the Exit Conference, the region and the review team will agree on any additional changes needed.

DRAFT REPORTS

In contrast to a working draft, the draft report is a polished document that typically does not contain gaps due to incomplete data analysis. We send this version to affected OPDIVs/STAFFDIVs for official comments.

Draft Report Format and Contents

The Project Leader and Program Analyst(s) are responsible for writing the draft report. The draft report is a revised version of the working draft report that addresses OPDIV/STAFFDIV comments from the Exit Conference.

Format all reports with the ALT Q macro. The ALT Q macro is an OEI in-house designed macro for formatting reports and therefore ensuring standardization (**Appendix H** contains

examples of report covers and section formats). The draft report should contain the basic elements as outlined under WORKING DRAFT REPORTS but will differ for the elements described below:

COVER & INSIDE PAGE

Use the ALT Q macro to produce the DRAFT report cover in OIG style. Complete the inside page information concerning the regional office, RIG, and the region and headquarters staff. Insert a page break and cut and paste the remaining sections of the working draft report.

TITLE PAGE

Change the title page from WORKING DRAFT to DRAFT. The title page and cover are identical. However, the ALT Q macro will not create a second cover page, therefore, copy and insert the cover page.

For additional guidance on report writing, refer to the *Write to the Point* manual and *Technical Assistance Guide 6, Specific Steps for Writing an Inspection Report*.

Submitting Draft Reports for Review Team Meetings

The RIG submits identical draft report packages **via electronic mail** to the review team, and the secretary to the DIG. **Do not electronically mail a copy of the draft report package to the DIG.** By releasing the report to headquarters, the RIG indicates that the report meets OEI standards for prescribed format, technical accuracy, clear and concise presentation of material, etc.

The Project Leader should contact the secretary to the DIG by telephone to request the documents be downloaded, printed, and given to the DIG, the Senior Advisor to the Deputy Inspector General, and the PED Director. If the secretary to the DIG is unavailable, the Project Leader should contact another headquarters secretary to request downloading of drafts. **Do not express mail draft reports for review team meetings.** The review team consists of

- Deputy Inspector General,
- Senior Advisor to the Deputy Inspector General,
- Program Evaluation Division, Director,
- Program Evaluation Division, Associate Director,
- Program Specialist,
- Technical Support Staff representative, and
- Project Team (including the Project Leader and TSAR regional members).

Each draft package consists of

- a cover memo (**Appendix I**),
- the draft report, and
- potential impact statement (**Appendix D**).

The potential impact statement previously submitted with the working draft should be updated to reflect potential impact resulting from data collection and analysis, comments from the review team, and comments from the Exit Conference. In the future the region will additionally input this information to the Impact Documentation System (IDS).

Review Team Meeting - Draft Report

Upon receipt of a draft report, the Program Specialist arranges a review team meeting to ensure the quality of report products as outlined on page 2 of this manual. Review team comments are advisory to the region. Draft reports are the product of a collaborative effort involving regional and headquarters staffs. While the RIG has responsibility for ensuring inspection quality, the regional project team should seriously consider headquarters comments.

The region and PED must reach a clear agreement that no more changes are needed. If major disagreements remain, the RIG and PED Director should settle them before submitting the draft report for the Inspector General's signature. The DIG will settle unresolved issues.

The Program Specialist notifies the person in POD responsible for processing reports, via electronic mail, at the same time that he/she notifies the region that the report is ready for IG signature.

Draft Report Printing

When the region and PED Director have agreed that the draft report is ready for the Inspector General's signature, the Project Leader will order printing following regional print request procedures.

Draft reports that will not be received in headquarters prior to the first day of the last full week in the month should show the next month on both the cover and title pages.

Submitting Draft Reports for Inspector General (IG) Approval

The RIG express mails draft report packages to headquarters and Baltimore (if Health Care related report).

Health Care Related Draft Reports

The RIG express mails to the POD (Barbara Hyman)

- 25 copies of the draft report (unstapled, blue DRAFT front cover, NO blue back cover),
- 2 camera-ready copies of the draft report,
- 1 copy of the morning report - on white bond paper (**Appendix I**),
- 1 copy of the memo to OPDIV(s) - on white bond paper (**Appendix I**),
- 1 copy of the letter to outside agency(ies) (if requesting agency comments) - on white bond paper (**Appendix I**),
- A 3½" diskette containing the morning report, memo to OPDIV(s), and letters to outside agencies (label the diskette with report name and number),
- 3 report packages containing the draft report (stapled, blue DRAFT front cover, blue back cover), morning report, and transmittal memos/letters (on white bond paper) for the
 - ▶ Deputy Inspector General,
 - ▶ Senior Advisor to the Deputy Inspector General, and
 - ▶ Program Evaluation Division, Director.

The RIG express mails to the Program Specialist (usually located in Baltimore)

- 10 copies (stapled, blue DRAFT front cover, blue back cover) of the draft report,
- 3 report packages containing the draft report (stapled, blue DRAFT front cover, blue back cover), morning report, and transmittal memos/letters (on white bond paper) for the
 - ▶ Program Evaluation Division, Associate Director
 - ▶ Program Specialist, and
 - ▶ Technical Support Staff representative.

Non-Health Care Related Draft Reports

The RIG express mails to the POD (Barbara Hyman)

- 25 copies (unstapled, blue DRAFT front cover, NO blue back cover) of the draft report,
- 10 copies (stapled, blue DRAFT front cover, blue back cover) of the draft report.
- 2 camera-ready copies of the draft report,
- 1 copy of the morning report - on white bond paper (**Appendix I**),
- 1 copy of the memo to OPDIV(s) - on white bond paper (**Appendix I**),
- 1 copy of the letter to outside agency(ies) (if requesting agency comments) - on white bond paper (**Appendix I**),

- A 3½" diskette containing the morning report, memo to OPDIV(s), and letters to outside agencies (label the diskette with report name and number),
- 5 report packages containing the draft report (stapled, blue DRAFT front cover, blue back cover), morning report, and transmittal memos/letters (on white bond paper) for the
 - Deputy Inspector General,
 - Senior Advisor to the Deputy Inspector General,
 - Program Evaluation Division, Director,
 - Program Evaluation Division, Associate Director, and
 - Program Specialist.

The RIG express mails to the Technical Support Staff representative

- 1 report package containing the draft report (stapled, blue DRAFT front cover, blue back cover), morning report, and transmittal memos/letters (on white bond paper).

Headquarters Processing of Draft Reports

The DIG or PED Director formally requests the POD to prepare the draft report package for IG signature.

The POD prepares the package in final form and forwards it to the OIG Executive Secretariat (OIG/ES) for approval and signature. **Note:** Prior to forwarding the package to the Executive Secretariat, the Program Specialist should notify POD to obtain clearance from other applicable OIG components, if they have done or are planning related work in the same subject area. The Program Specialist and POD can obtain informal clearance to facilitate the official clearance process. Thereafter, POD can obtain official clearance by getting the other component(s) DIG's signature(s) on the yellow file copy.

After the IG signs the memos, OIG/ES sends the morning report to the Secretary (if so indicated) and draft inspection reports and transmittals to the OPDIV/STAFFDIV(s). In addition, POD makes distributions of the draft report using the Internal Distribution List (see **Appendix J**), and distributes the draft report with a "Dear Colleague" note from the DIG to peers (addressees vary according to subject matter of reports).

The POD notifies the region that the IG has signed the draft report, requests additional copies to complete headquarters distribution (including DIG's "Dear Colleague" note) and sends the region two copies of the signed memoranda and a copy of the morning report.

Handling Draft Report Comments

We ask the OPDIVs and STAFFDIVs to comment on the draft report within 45 calendar days from the date on the cover memorandum. The Program Specialist will determine the due date for

internal OIG purposes by adding 5 working days to the date on the transmittal memorandum. The Program Specialist will maintain contact with the OPDIV/STAFFDIV to insure timely response.

Should an OPDIV/STAFFDIV need an extension, the Program Specialist will consult with the RIG, then forward the request to the DIG. We may grant an extension up to 15 calendar days upon a written request to the DIG. If we grant an extension, the Program Specialist will prepare a memorandum for the record noting the date the comments are due. They will give a copy of the memorandum to the RIG and PED Director. The OEI ***will not*** grant routine requests to extend the 45 day comment period.

The Project Leader and the Program Specialist will discuss the OPDIV/STAFFDIV comments and suggested responses. The review team and the project team will then discuss the comments so that they reach agreement on the nature of the response.

The region incorporates the OPDIV/STAFFDIV comments, and any other comments, into the final report. The report acknowledges receiving the comments and includes an OIG response to them. Sometimes, the region may revise portions of the report because of these comments. The entire text of the comments is generally incorporated as an appendix to the final report. We make exceptions to this practice on a case-by-case basis.

If the OPDIV/STAFFDIV does not respond within the approved time, we will issue the final report without the benefit of their comments.

FINAL REPORTS

The final report is a revised version of the draft report that addresses OPDIV/STAFFDIV written comments. After the IG signs the report, it is available to the public.

Final Report Format and Contents

The Project Leader and Program Analyst(s) are responsible for preparing the final report. Format all reports with the ALT Q macro. The ALT Q macro is an OEI in-house designed macro for formatting reports and therefore ensuring standardization (**Appendix H** contains examples of report covers and section formats). The final report should contain the basic elements as outlined under DRAFT REPORTS but will differ for the elements described below:

COVER & INSIDE PAGE

Use the ALT Q macro to produce the FINAL report cover in OIG style. Complete the inside page information concerning the regional office, RIG, and the region and headquarters staff. Insert a page break and cut and paste the remaining sections of the draft report. **Note:** The inside cover of the final report includes the “To obtain copies . . .” statement.

TITLE PAGE	Change the title page from DRAFT to FINAL. The title page and cover are identical. However, the ALT Q macro will not create a second cover page in the same document, therefore, copy and insert the cover page.
EXECUTIVE SUMMARY	May require formatting changes from DRAFT. May need to add Agency Comments (including OIG response) section (see page 30).
AGENCY COMMENTS	This section should provide a complete summary of agency and/or other organizations' comments to our DRAFT report. Following the agency comments should be a brief OIG response.
APPENDICES	No formatting changes from DRAFT. If we receive agency comments on the draft report, include a complete copy of those comments in the appendix.

For additional guidance on report writing, refer to the *Write to the Point* manual and *Technical Assistance Guide 6, Specific Steps for Writing an Inspection Report*.

Submitting Final Reports for Review Team Meetings

The Program Specialist and Project Leader decide whether report changes and/or agency comments warrant the need for a review team meeting. If so, the RIG submits identical final report packages and anticipated impact report form **via electronic mail** to the review team, the secretary to the DIG, and the Special Assistant to the DIG. **Do not electronically mail a copy of the final report package to the DIG.** By releasing the report to headquarters, the RIG indicates that the report meets OEI standards for prescribed format, technical accuracy, clear and concise presentation of material, etc.

The Project Leader should contact the secretary to the DIG by telephone to request the documents be downloaded, printed, and given to the DIG, the Senior Advisor to the Deputy Inspector General, and the PED Director. If the secretary to the DIG is unavailable, the Project Leader should contact another headquarters secretary to request downloading of these documents. **Do not express mail final reports for review team meetings.** The review team consists of the

- Deputy Inspector General,
- Senior Advisor to the Deputy Inspector General,
- Program Evaluation Division, Director,
- Program Evaluation Division, Associate Director,
- Program Specialist,
- Technical Support Staff representative, and
- Project Team (including the Project Leader and TSAR regional members).

Each final package consists of

- a cover memo (**Appendix I**),
- the final report including agency comments (regions that do not have a scanner should FAX agency comments to the secretary to the DIG), and
- anticipated impact statement (**Appendix D**).

The potential impact statement previously submitted with the draft should be updated to reflect anticipated change by OPDIVs/STAFFDIVs, or other policy makers based on our recommendations. In the future the region will additionally input this information to the Impact Documentation System (IDS).

Review Team Meeting - Final Report

Upon receipt of a final report, the Program Specialist arranges a review team meeting to ensure the quality of report products as outlined on page 2 of this manual. Review team comments are advisory to the region. Inspection reports are the product of a collaborative effort involving regional and headquarters staffs. While the RIG has the responsibility for ensuring the quality of the inspection, the RIG and the regional project team should seriously consider headquarters comments.

Develop and discuss as needed the external distribution list at the review team meeting. (See **Appendix J** for a copy of the list.) The review team will inform the region if a transmittal/final report needs to go to the Secretary.

The region and PED must reach a clear agreement that no more changes are needed. If major disagreements remain, the RIG and PED Director should settle them before submitting the final report for the Inspector General's signature. The DIG will settle unresolved issues.

The Program Specialist notifies the person in POD responsible for the report's processing, via electronic mail, at the same time that he/she notifies the region that the final report is ready for IG signature.

Final Report Printing

When the region and PED Director have agreed that the final report is ready for the Inspector General's signature, the Project Leader will order printing following regional print request procedures.

Reports that will not be received in headquarters prior to the first day of the last full week in the month should show the next month's date on both the cover and title pages.

Submitting Final Reports for Inspector General (IG) Approval

The RIG express mails final report packages to headquarters and Baltimore (if Health Care related report).

Health Care Related Final Reports

The RIG express mails to POD (Barbara Hyman)

- 25 copies (unstapled, blue FINAL front cover, NO blue back cover) of the final report,
- 2 camera-ready copies of the final report,
- An External Distribution List (**Appendix J**)
- 1 copy of the morning report - on white bond paper (**Appendix I**),
- 1 copy of the memo to OPDIV(s) - on white bond paper - **Note:** When we are issuing a report in final and we issued no previous draft, include in the transmittal memo from the IG to the OPDIV/STAFFDIV a statement to that effect (**Appendix I**),
- A 3½" diskette containing the morning report, memo to OPDIV(s), and letters to outside agencies (label the diskette with report name and number),
- A 3½" diskette containing the final report (label the diskette with report name and number), and
- 3 report packages containing the final report (stapled, blue final front cover, blue back cover), morning report, and transmittal memos/letters (on white bond paper) for the
 - ▶ Deputy Inspector General,
 - ▶ Senior Advisor to the Deputy Inspector General, and
 - ▶ Program Evaluation Division, Director.

The RIG express mails to the Program Specialist (usually located in Baltimore)

- 10 copies (stapled, blue FINAL front cover, blue back cover) of the final report,
- 3 report packages containing the final report (stapled, blue final front cover, blue back cover), morning report, and transmittal memos/letters (on white bond paper) for the
 - ▶ Program Evaluation Division, Associate Director
 - ▶ Program Specialist, and
 - ▶ Technical Support Staff representative.

Non-Health Care Related Final Reports

The RIG express mails to POD (Barbara Hyman)

- 25 copies (unstapled, blue FINAL front cover, NO blue back cover) of the final report,
- 10 copies (stapled, blue FINAL front cover, blue back cover) of the final report,
- 2 camera-ready copies of the final report,
- An External Distribution List (**Appendix J**)
- 1 copy of the morning report - on white bond paper (**Appendix I**),
- 1 copy of the memo to OPDIV(s) - on white bond paper - **Note:** When we are issuing a report in final and we issued no previous draft, include in the transmittal memo from the IG to the OPDIV/STAFFDIV a statement to that effect (**Appendix I**),
- A 3½" diskette containing the morning report, memo to OPDIV(s), and letters to outside agencies (label the diskette with report name and number),
- A 3½" diskette containing the final report (label the diskette with report name and number),
- 5 report packages containing the final report (stapled, blue final front cover, blue back cover), morning report, and transmittal memos/letters (on white bond paper) for the
 - ▶ Deputy Inspector General,
 - ▶ Senior Advisor to the Deputy Inspector General,
 - ▶ Program Evaluation Division, Director,
 - ▶ Program Evaluation Division, Associate Director, and
 - ▶ Program Specialist.

The RIG express mails to the Technical Support Staff representative

- 1 report package containing the final report (stapled, blue final front cover, blue back cover), morning report, and transmittal memos/letters (on white bond paper).

Headquarters Processing of Final Reports

The DIG or PED Director formally requests the POD to prepare the report package for IG signature.

The POD prepares the package in final form and forwards it to the OIG Executive Secretariat (OIG/ES) for approval and signature. **Note:** Prior to forwarding the package to the Executive Secretariat, the Program Specialist should notify POD to obtain clearance from other applicable OIG components, if they have done or are planning related work in the same subject area. The Program Specialist and POD can obtain the informal clearance to facilitate the official clearance process. Thereafter, POD can obtain official clearance by getting the other component(s) DIG's signature(s) on the yellow file copy.

After the IG signs the memos, OIG/ES sends the morning report to the Secretary (if so indicated) and final inspection reports and transmittals to the OPDIV/STAFFDIV(s). In addition, POD makes distributions of the final report using the Internal and External Distribution Lists (**Appendix J**), and distributes the final report with a “Dear Colleague” note from the DIG to peers (addressees vary according to subject matter of reports).

The POD notifies the region that the IG has signed the final report, requests additional copies to complete headquarters distribution (including DIG’s “Dear Colleague” note) and sends the region two copies of the signed memoranda and a copy of the morning report for the work paper files..

The region makes widespread distribution of reports to interested parties and sends at least four copies to each region (eight copies for regions 7 and 9).

Reports signed by the DIG are loaded on the OEI World Wide Web Home Page only with the approval of the DIG. We will obtain the approval/disapproval when the DIG signs the final report. The report will be loaded on the Web no later than 10 working days after obtaining the DIG’s approval.

Handling Final Report Comments

We ask the OPDIVs and STAFFDIVs to comment on the report within 60 calendar days from the date on the cover memorandum transmitting the final draft. The Program Specialist will determine the due date for internal OIG purposes by adding 5 working days to the date on the transmittal memorandum. The Program Specialist will maintain contact with the OPDIV/STAFFDIV to insure timely response.

Should an OPDIV/STAFFDIV need an extension, the Program Specialist will consult with the RIG, then forward the request to the DIG. They may grant an extension up to 15 calendar days upon a written request to the DIG. If they grant an extension, the Program Specialist will prepare a memorandum for the record noting the date the comments are due. They will give a copy of the memorandum to the RIG and PED Director. The OEI ***will not*** grant routine requests for extending the 60-day comment period.

The review team will discuss the OPDIV/STAFFDIV comments and decide on the appropriate action. In situations where the OPDIV/STAFFDIV is non-responsive to the report recommendations, consider conflict resolution (see page 40).

OTHER REPORTS

We usually report the results of OEI evaluations in inspection reports. However, some situations may call for an alternative method of reporting. Treat each situation on a case-by-case basis. The review team should discuss the report format, content, addressee, and signatory. The DIG will decide which format will be used.

Alternative methods of reporting include a Vulnerability Alert, Consultative report, a Memo report, or a Technical report. The format for any of these alternatives may vary and are treated individually. They may be signed by the Inspector General, the Deputy Inspector General for Evaluation and Inspections, the PED Director, or the Regional Inspector General. We will make decisions on the type and format of the report at the review team meetings.

BRIEFINGS

An effective way to present program inspection findings and recommendations to the Inspector General and other top Department of Health and Human Services (HHS) officials is by personal briefing. We usually conduct briefings in conjunction with issuing the final inspection report **(person conducting the briefing varies, depending on the circumstances)**. While briefings may not be appropriate for every inspection, we typically hold them with the Inspector General, top Department officials, and other OIG components. We also conduct briefings for outside groups such as State and local officials, associations, and congressional staff, when appropriate.

Steps and Responsibilities

Considerable variation exists in the style and method of briefing preparation. However, the following steps are typical of most briefings.

1. The Project Leader prepares briefing charts, slides, or other visual aids and handouts. They should design visual aids and remarks for delivery in 20 minutes or less to allow ample time for questions and discussion.
2. The Program Specialist and other team members provide comments on the draft visual aids to the Project Leader. Once they reach agreement on the content and format of these materials, the Program Specialist arranges for the graphics shop to develop professional presentation materials.
3. The Program Specialist schedules briefings. Usually, they schedule a pre-briefing for the review team, which the IG may attend. Next, we give a formal briefing for the OPDIVs/STAFFDIVs and the IG. If appropriate, we may also brief other OIG components.
4. The Program Specialist prepares a memo for IG signature to the appropriate OPDIV/STAFFDIV confirming the briefing and summarizing program inspection findings and recommendations.
5. Attendance at briefings will be determined on a case-by-case basis, depending on such factors as the size and composition of the audience, and the preferred presentation style of the senior official being briefed.

Note: See *Technical Assistance Guide 7, Presenting an Effective Inspection Briefing*, for advice in preparing a briefing.

SPEECHES TO EXTERNAL GROUPS

When an OEI employee is asked to speak in an official capacity at conferences, meetings or other events sponsored by an external party, specific approval must be obtained as outlined in the steps below. For these purposes, an external party is defined as individuals, organizations and entities outside the Executive Branch of the Federal Government.

1. **State, Local and Non-Executive Branch Federal Government Organizations** - The immediate supervisor has the delegated authority to approve the request for the employee to speak before these groups. These requests can be routinely approved (depending on budget and resource constraints) but should be discussed with the DIG. Formal, signed approval is not required, however, the “OIG Clearance Form for External Speeches” should be signed by the direct supervisor and faxed to the Special Assistant to the DIG at (202) 619-2034 (see **Appendix K**).
2. **Specified Not-For-Profit Organizations and Associations** - The immediate supervisor has the delegated authority to approve the request for the employee to speak before organizations listed in **Appendix K**. If the immediate supervisor prefers, the DIG for OEI can approve the request. In any event, requests should be discussed with the DIG and a form faxed to the Special Assistant to the DIG.
3. **Non-Specified Not-For Profit and For-Profit Organizations** - The employee must complete the “OIG Clearance Form for External Speeches” (see **Appendix K**). The immediate supervisor, the DIG for OEI and the DIG for Management and Policy must approve the request. The requests to speak before not-for-profit organizations that are not included on the OIG list will be approved on a case-by-case basis.

Requests to speak at for-profit organizations will be carefully considered. Many of them stand to gain financially and may possibly benefit directly from the employee’s participation in the event. The OIG has determined that generally the appearance of conflict of interest and preferential treatment outweigh the benefits of allowing an OIG employee to speak at the event. Generally, these speaking requests will be denied unless the employee can demonstrate that the benefits outweigh the risks.

Organizations That Pay Travel Costs - Generally, OEI will pay the costs for the employee to attend and speak at events, even if the organization has offered to pay those costs. If OEI cannot pay these costs because of resource constraints, the employee must get formal, signed approval from their immediate supervisor and the DIG using the “OIG Clearance Form for External Speeches” (**Appendix K**). This is true regardless of the type of organization making the request. This approach should be rarely, if ever used.

Requests that require the approval of the DIG should be faxed to the Special Assistant to the DIG. They will coordinate the approval process and keep the employee and supervisor informed of the status of the request.

FOLLOW UP TO RECOMMENDATIONS

The PED is responsible for all follow-up activities. The PED prepares items for the Red Book (unimplemented monetary recommendations) within 2 weeks after the release of the draft report. Orange Book items (unimplemented non-monetary recommendations) are prepared within 2 weeks from the date we receive the OPDIV⁴ response.

The OPDIV has 60 days to respond to the final report. The OPDIV response to the final report is their “management decision” or commitment to act on agreed upon recommendations. (For the Health Care Financing Administration [HCFA], they frequently do not reach the management decision until completion of negotiations addressing final comments.) When we receive the OPDIV response, the Program Specialist schedules a meeting with the RIG/DRIG, Project Leader, Team Leader, PED Director, and PED Associate Director to discuss the OIG response to the management decision. The purpose of this meeting is to agree upon the nature of the OPDIV response (did they agree or disagree); agree on the action, if any, the OIG will take (see options below), and determine if an Orange Book item should be prepared and the content of that item. (Red Book items should be prepared during the draft report stage.)

Possible options include, but are not limited to, (1) the OPDIV agrees to implement, or (2) the OPDIV disagrees and does not implement.

If the OPDIV agrees to implement our recommendations, OIG may do one of the following:

- Accept the OPDIV agreement and proposed actions and indicate that we will follow up until final action occurs.
- State that we do not believe that OPDIV plans adequately address the issue. We could take one of the following actions: take it to conflict resolution, handle it in a less formal but structured way but continue to track it, or decide not to pursue other than through the Orange or Red Books.

If the OPDIV disagrees and will not implement the recommendations, OIG may do one of the following:

- Accept the OPDIV position--and the recommendation is closed. Neither the OIG nor the OPDIV will track or pursue the issue. We will not include the information in the Red or Orange Books.
- Accept the OPDIV position but indicate that we intend to include the information in the Red or Orange Books.
- Not accept the OPDIV position and pursue through conflict resolution.

⁴ In some instances, a STAFFDIV may be the subject of our inspections. In such instances they are subject to the same requirements as those described for the OPDIV in this section of the manual.

The PED, with assistance from the region, prepares a formal response that they usually send to the OPDIV Audit Liaison staff to inform them of our intended actions, if any. Frequently, negotiations occur at this stage which would impact our planned actions.

The Program Specialist will notify the appropriate RIG and Project Leader on the subsequent disposition of recommendations by OPDIV.

CONFLICT RESOLUTION

Conflict resolution is necessary when OPDIVs⁵ disagree with recommendations resulting from OEI reports.

BACKGROUND

The 1988 IG Amendments (P.L. 100-504) established new reporting requirements for both the OIG and OPDIV management. The IG Amendments require OPDIV management to make final decisions on OIG recommendations within 6 months of issuance of the final report and to implement those recommendations accepted by OPDIV management within 1 year of issuance of the final report.

The intent of the IG Amendments is to encourage the OIG and OPDIV management to reach final resolution on areas of disagreement and to establish accountability for action and reporting by both the OIG and OPDIV management. We must work closely with Assistant Secretary for Management and Budget (ASMB) and the OPDIVs/STAFFDIVs on individual OIG reports, as well as our semiannual reports, so that we can comply with the requirements of the IG Amendments.

The Department has developed a formal conflict resolution process to ensure compliance with the IG Amendments and to resolve OIG and management disagreements on specific OIG recommendations. The formal process begins with the OPDIV's official nonconcurrence with an OIG recommendation. However, OIG and OPDIV attention to the process must begin much earlier than this official nonconcurrence.

OEI RESPONSIBILITIES

The regions and PED share the responsibility for ensuring that OPDIVs accept our findings and implement our recommendations. As a result, we need to develop recommendations that (1) help correct the problem identified, (2) are reasonable and cost-effective, and (3) are specific enough for the OIG and the OPDIV to understand the implementation process and to know when it has occurred.

The PED has responsibility for advising the Project Leader on how the OPDIVs might react to the recommendations and for suggesting ways to state recommendations that will enhance the likelihood of OPDIV acceptance and action.

While we may proceed in one of two ways, informally or formally, our efforts should focus on resolving conflicts before using the formal process. Once the formal process begins, it becomes resource intensive for everyone. A third party will impose a decision and we risk losing control of the process.

⁵ Ibid, Pg 38.

Further information regarding the conflict resolution process may be found in the OEI publication, *Implementation of the Conflict Resolution Process*, April 1990.

INFORMAL CONFLICT RESOLUTION PROCESS

The Exit Conference has traditionally been, and will continue to be, the point at which we initially discuss our potential recommendations and get the OPDIV's reaction. Another opportunity to resolve disagreements with the OPDIV occurs when we release the draft report.

When the OPDIV responds to our draft report, the Program Specialist and Project Leader should carefully consider any recommendations with which the OPDIV does not concur. They should confer with each other, the RIG, and the PED Director. Informal discussion can occur at this point between OEI and OPDIV officials to iron out difficulties before issuing final report recommendations. If no resolution occurs, the PED Director and RIG should confer with the DIG, and the Senior Advisor to the Deputy Inspector General to identify and submit recommendations for formal conflict resolution.

When we receive the OPDIV response to a final report, the Program Specialist will schedule a meeting with the DIG, Senior Advisor to the Deputy Inspector General, the PED Director, the RIG, and the Project Leader to discuss the OIG position on the comments. We need to decide if the OPDIV response is acceptable. Has the OPDIV stated how it intends to act on agreed upon recommendations? Do we think the planned actions are responsive? If the response is not acceptable to us, we need to decide if we are going to take the issue to conflict resolution. If we decide not to elevate it to conflict resolution, we will need to decide what action we will take, if any.

Part of the meeting will focus on preparing Orange Book items (the Red Book items were prepared when we released the report in draft). We will decide which findings/recommendations to summarize and discuss the information to include in the status section. Regardless of our decision, PED will prepare a written summary of the OIG position and intended actions. Send this summary over the PED Director's signature to the appropriate OPDIV audit liaison staff with copies to PED and the regional office.

The summary to the OPDIV and the Orange Book summary should be prepared within 2 weeks of our discussion. The PED staff should follow the normal Orange and Red Book procedure for preparing and submitting these summaries.

FORMAL CONFLICT RESOLUTION PROCESS

When we cannot resolve issues through the informal conflict resolution process, the formal process should be initiated. The formal conflict resolution process consists of four steps:

1. In response to our final report transmittal memorandum, the OPDIV states that it does not concur with our recommendation(s).
2. If the OIG does not agree with the OPDIV's nonconcurrence within 60 days after we issue the final report, OPDIV and OIG representatives of comparable rank must meet to discuss the recommendation. If we reach agreement, resolution occurs.

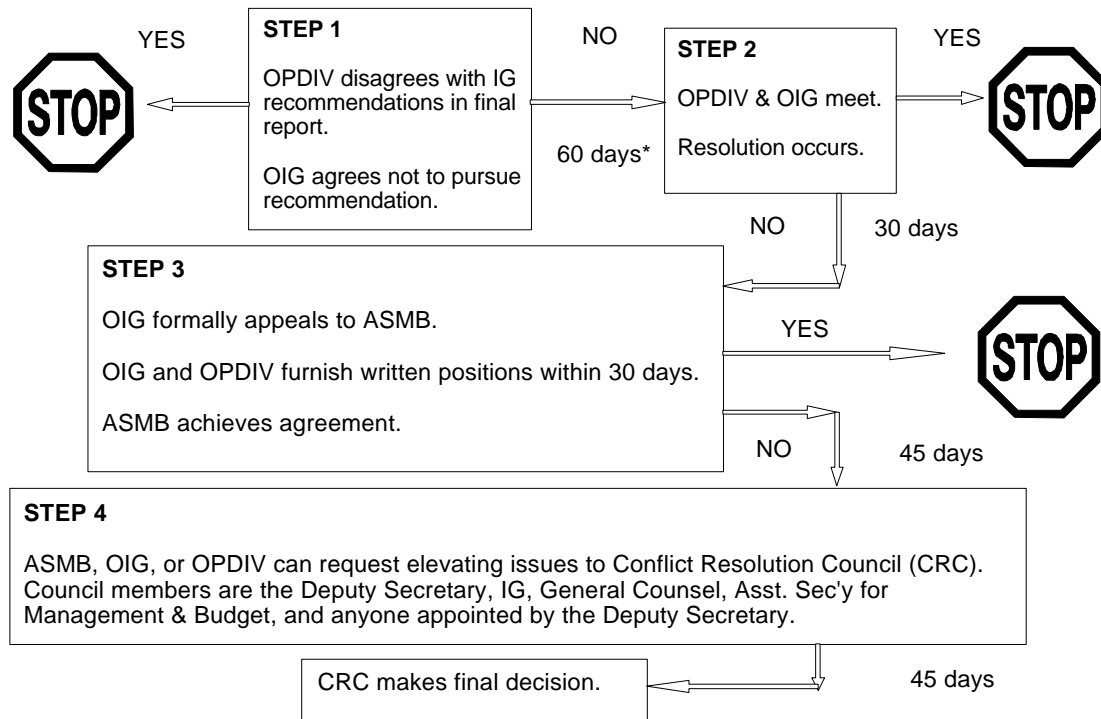
3. If we do not reach agreement within 90 days after the date of the final report, the OIG formally appeals to the Department Audit Follow-up Official, the Assistant Secretary for Management and Budget (ASMB). We give a copy of the appeal to the OPDIV. Both the OIG and the OPDIV furnish their positions in writing to ASMB within 30 days using the following format:
 - Title, IG number, and the date of issuance of the final report.
 - List of IG findings and recommendations accepted.
 - List of IG findings and recommendations not accepted.
 - Statement of the issue and supporting arguments (in bullet form).
 - Impact analysis including
 - ▶ financial data quantifying the cost or savings to the Federal, State, and local Government, program or service providers, and program beneficiaries;
 - ▶ assessing the benefits to be achieved and identifying who benefits;
 - ▶ assessing any adverse consequences from the recommendations and identifying who would be adversely affected; and
 - ▶ describing the results of previous reviews or decisions on this issue (budget, policy, or legislative reviews, etc.).

If ASMB achieves agreement or makes a decision that satisfies both sides, resolution occurs.

4. If we do not reach agreement with ASMB intervention within 135 days after the date of the final report, the Inspector General, the Assistant Secretary for Management and Budget, and the OPDIV Head may raise the issues to the Conflict Resolution Council (CRC). The Council advises the Deputy Secretary, who makes the final decision *within 180 days* after the date of the final report.

The chart on the following page helps to clarify the steps.

Formal Conflict Resolution Process



* Time is counted from the release of the final report. Total days for the process 180.

DISCLOSURE AND DISTRIBUTION OF INFORMATION AND REPORTS

DISCLOSURE

Final reports are in the public domain, and are released to the public upon request. After we issue a final report, work papers are also in the public domain and are usually available for the scrutiny of those interested. We cannot release some work papers containing information about identifiable individuals due to federally mandated privacy protections.

We protect and control draft reports. We do not release them publically. They are only available within the Department and selected outside organizations that have congressional hearings on the issues in the report.

DISTRIBUTION

Both headquarters and regions will distribute final reports. We should widely distribute finals for maximum impact, and target those organizations and individuals that have particular interest in the report's subject matter.

As a caveat to the preceding paragraph, we should generally delay wide distribution a short time in order to allow the Department to prepare a response to the report. This is especially true for those issues in which the press will show an interest.

Automatically disseminate all reports to the relevant OPDIVs; STAFFDIVs (ASL, ASMB, ASPE, ASPA, and ASPE/PIC); DIG's list of key personnel (this varies with each study); the OEI Home Page on the World Wide Web; the Office of Management and Budget; and Congress (see **Appendix J** - Internal Distribution List).

We will also tailor dissemination of our reports to more specific groups, depending on the issues. These include selected national organizations, other relevant professional organizations that may have an interest in the study issues, and to individual or organizations the inspection team contacted during the study. In addition, staff should use conferences they attend as excellent opportunities to disseminate our reports (see **Appendix J** - External Distribution List).

Consider informing the industry press-association newsletters, etc., of our report results when it is relevant to the issues they cover.

CONTACTS BY THE NATIONAL MEDIA

The Public Affairs Regulations and Reports (PARR) will respond to media requests. Sometimes, PARR may refer the media to OEI staff as appropriate. We should only take a pro-active approach with the national media (network news organizations, Washington Post, NY Times, etc.). This will be a headquarters decision, involving the OIG's public affairs office in headquarters, based on a specific purpose, or when we feel the report subject matter needs national attention.

When the press contacts someone in the organization concerning a final report, provide copies of it. However, if they are requesting to interview or seek information, staff should tell them they do not do interviews and then refer them to the OIG's public affairs office in headquarters. Report all contacts with the media to OEI headquarters (who will also inform the OIG's public affairs office). Managers in headquarters, in consultation with the regional office and other members of the OIG, will decide how to present our work to the press.

OUR MEDIA POLICY

Our goal is to create positive change in the Department's programs. Usually we do not seek media attention. However, we might do so on rare occasions when the media are already aware of our work and when we feel that their attention may focus organizations to resolve problems. Most of the time, we are responding to their inquiries. When we do so, only designated people respond. They should keep our message consistent.

We hope that our work will speak for itself, but sometimes this is not the case, and we need to be prepared for those situations. Relationships are vital to our work, but if the OPDIVs see us as consistently making them look bad in the press, they may become resistant to working with OEI staff. If this occurs, we will have damaged our ability to do our jobs, not just on specific issues but on all of them.

CONGRESSIONAL INTERACTION

Handle interactions with Congress and congressional staffs in the same manner as media contacts, provide reports when requested, refer calls to headquarters, and report all contacts with congressional staff to the Program Specialist who in turn will notify the appropriate managers.

SAFEGUARDING CONFIDENTIAL INFORMATION

ACQUIRING PERSONAL DATA

The Privacy Act governs most personal data collected and used by the OPDIVs. This gives individuals some control over the records a Federal agency collects about them and over the use made of the records. Public Law 94-505, which created the OIG, provides that the OPDIV may disclose records contained in a system of records (as defined by the Privacy Act, P.L. 93-579) to the OIG in the course of performing official duties without the consent of the individual for whom the records are maintained.

PRIVACY ACT PROTECTION

When the OIG uses data with personal identifiers (e.g., name and Social Security number) from OPDIV records, we also acquire the responsibility to safeguard that data from improper use in a manner consistent with applicable laws and regulations. Much of the data we use comes from systems of records covered by the Privacy Act, and as such are protected from unauthorized use by the provisions of the Act. The Privacy Act provides criminal penalties for any Federal employee who makes unauthorized disclosure of Privacy Act protected information.

SAFEGUARDING PERSONAL DATA

We must use reasonable care always in safeguarding personal data. We are responsible for information entrusted to us by OPDIVs and we must not abuse that trust.

Personal data should not be left open to the view of others who may not have a right to examine it. We should always protect such data from scrutiny, theft, tampering, damage, or loss.

We should take the following security precautions during each inspection:

- Include in the inspection design a reminder that records are to be safeguarded against unauthorized disclosure if the inspection involves tests of records that contain personal information, such as payroll records, personnel records, benefit payment histories, etc.
- Label all data, including working papers and printouts, that contains personal information. Labeling will reduce the probability of accidental abuse of the data.
- Store working papers and computer printouts containing personal data under lock and key. This process conditions users to respect confidentiality of the material in their possession.

FREEDOM OF INFORMATION (FOIA) REQUESTS

OEI policies and procedures to be developed.

[Note: Freedom of Information Act requests--We will not release supporting material relating to an inspection prior to issuing the final report. We will release this material only after discussion with the DIG and with the Freedom of Information Coordinator, Office of Investigations.]

WORK PAPERS

INTRODUCTION

These procedures provide guidelines for establishing and maintaining work papers within OEI.⁶ Work papers are all written and electronically stored (computer) records obtained or created during the inspection.

These procedures apply to all OEI inspection-related activity, despite the type of report issued. We have not established rigid rules since each inspection is unique and we need some degree of flexibility to organize the material collected into a usable reference file. Exercise professional judgment, and in unusual cases, headquarters and regional staffs may wish to establish other appropriate procedures jointly.

In recognition of the advances in computer technology and resources, maintain supporting documentation in either written or electronic form as long as the final report is clearly cross-referenced to the appropriate electronic or paper document.

PURPOSE OF WORK PAPERS

Work papers serve as the supporting source for all information and data as shown in the final inspection report. They serve as an audit trail between the information collected during the preinspection and field work phases of the inspection and material presented in the inspection report.

The main purposes of work papers are to provide

- a systematic record of the work performed in conducting the inspection,
- a record of information obtained and developed to support inspection finding(s) and recommendation(s), and
- a record of useful information for planning and as reference for related future inspections.

ORGANIZATION OF WORK PAPER FILES

Establish the work paper file system at the beginning of the inspection. This system consists of two broad divisions: Primary File(s) and Secondary File(s). The Primary File contains essential supporting documentation for the inspection. The Secondary File contains bulky supporting data and materials that are less essential. The Primary File materials must be comprehensive to assure that we can trace all report information to its source.

⁶ These procedures replace the “Work Paper Procedures” dated 1988 and “Instructions for Setting Up Your Work Paper Files.”

When the inspection begins, the Project Leader should establish a Primary File, which consists of the following distinct sections

- (1) Table of Contents,
- (2) Research and Preinspection,
- (3) Inspection Design,
- (4) Data and Analysis,
- (5) Report, and
- (6) Follow-up Activities

The Secondary File(s), however, may not require all six parts. The Project Leader will determine which parts are needed based upon the volume and relevance of material.

Note: Each Secondary File should have a Table of Contents, with a copy filed in the Primary File (Table of Contents section).

Label these sections as distinct parts of the Primary or Secondary File with the name of the inspection and the inspection number. Using Computer labels, such as Avery 5160 labels, will expedite this process.

The Project Leader, with the RIG will determine the method of filing and labeling individual files within these six parts of the work papers. Later sections of this manual describe the work paper filing system.

AUTOMATED WORK PAPERS AND ELECTRONIC DATA FILES

Electronic Spread Sheets

When electronic spread sheets are used in the inspection, we should print and document a sample spread sheet with the formula. Treat the spread sheets like any other work paper and file them in the appropriate section, which will probably be either the Research and Preinspection section, (as an example, file category P-2-C) or the Data and Analysis section (file category P-4-F).

Automated Data Base Queries and Extracts

When using automated data base management systems, retain a copy of the data base and any specific queries/extracts used to develop the findings in the inspection on computer disk(s). Without this information, the logic of the query and the resulting observations may be difficult, or impossible, to recreate at a future date. File this information in the Data and Analysis section (as an example, file category P-4-F).

Flow Charts

If we write specialized programs as part of an inspection, the program logic should be flow charted, and filed in the appropriate section.

Computer Disks

All disks should include a short, narrative description of the files on the jacket. We should label each disk with the inspection name and inspection number and retain it in the Primary File. We should activate or place a “write protecting” tab on the disk to prevent unintentional destruction. A printout of the disk’s directory should be part of the work paper files.

File the disk and printout of the directory in the appropriate work paper section, Table of Contents (file category P-1-C), Research and Preinspection (file category P-2-C), or Data and Analysis (file category P-4-F).

GENERAL STANDARDS

Completeness, Accuracy, and Clarity

Work papers should be complete and accurate to support findings and recommendations and to document activities performed during the conduct of an inspection. Work papers should be clear and understandable as to their purpose, the nature and scope of work done, and the resulting findings and recommendations. Conciseness is important, however, do not sacrifice clarity and completeness for the sake of brevity.

Legibility and Neatness

Work papers should be neat and legible. Handwritten work papers are acceptable.

Relevance

We should restrict work paper materials to matters that are materially important, relevant, and useful.

Retention Period

Retain the Primary File in the regional office for at least 3 years after the release of the final report, when we can send it to the Federal Records Center. We can send the Secondary File to the Federal Records Center 6 months after the release of the final report. We can destroy these records after 5 years. The RIG may extend the retention period for the Primary and Secondary Files depending on specific circumstances associated with an inspection.

Retain draft copies of documents such as inspection designs and final reports in the Secondary File. At the conclusion of an inspection, the lead analyst should review the files and determine the number of iterations of these documents to retain.

Disposition of Materials Obtained by Support Regions

Occasionally regions support other regions in the conduct of an inspection. The “lead” region should determine what should be collected and the format for preparing the work papers. When the “support” region has completed its work, send all work papers to the “lead” region. The “lead” region should then place the relevant files into the Primary and Secondary Files and cross-reference as needed. Retention of any copies of materials sent to the “lead” region by the “support” region is at the discretion of the “support” region.

CROSS-REFERENCING

Each work paper Primary File must contain a cross-referenced copy of the final report. Cross-referencing involves ensuring that statements of fact and findings are supported by specific items, data, or documents. Cross-referencing helps to ensure the integrity and credibility of OEI’s work. The cross-referenced document is an invaluable tool when a question arises about the source for a statement, fact, statistic, finding, or other information contained in the inspection report and the Appendix(es). Do not perform cross-referencing for the Executive Summary and Recommendations sections of the report.

Because of the diversity of the work in OEI, we prescribe no uniform system of cross-referencing. For example, one report might lend itself to a narrative summary that describes the source of each finding and recommendation. Another report might be more easily cross-referenced using marginal notes in a copy of the final version. Whatever method is used, it is most important that data or information can be located with ease. Some regions have also opted to use the endnotes feature on WordPerfect to electronically record the cross-references in the annotated copy of the final report.

Some uniform principles for cross-referencing are as follows:

- The Project Leader should determine the specific method to be used.
- The system should control the logical grouping of the work papers in the Secondary File and facilitate reference to the work papers.
- The system should be simple. Long and complex numbers are not required.

PREPARATION OF DATA ANALYSIS SUMMARIES

Summaries of data collected are not required, but are recommended for certain inspections. It may be appropriate, for example, to prepare a summary describing the results of the analysis of data on a mainframe computer or data in a statistical sample. A sampling summary (file category P-3-D) would describe the methodology used and the rationale for the methodology. These summaries are narrative presentations, but may also include tabulations and schedules.

We prescribe no specific format or style for summaries. However, they should describe the work done on the plans and issues as established in the inspection design. Summaries should identify sources of information, and serve to supplement the cross-referencing process.

GENERAL REFERENCE FILE

In addition to work paper files, a regional office may want to maintain a general reference file of materials to be used in future inspections. A general reference file may also be useful in developing work plan topics. If material from a general reference file is used in direct support of an inspection, we should include a reference in the Primary or Secondary File as appropriate.

A general reference file might include

- legislative history of programs,
- descriptions of organizations and personnel in an organization or program,
- statistics on appropriations and expenditures,
- studies, bibliographies, and other material related to issues of interest to OEI, and
- discussion guide materials that may be used as examples for specific inspections.

A general reference file should have an index or Table of Contents to help locate items. Arrange materials by topics and in chronological order.

Work paper file sections are described as follows:

File P-1--Table of Contents Section

The Primary File should contain:

Suggested File Category
--

- | |
|---|
| <ul style="list-style-type: none">• P-1-A The completed Work Paper File Checklist. We have designed this form to aid the RIG/DRIG in the review and certification of the work papers. Not all items on the checklist will be applicable to each inspection. If an item does not apply, such as the Design Conference, Story Conference, etc., annotate the form by entering “N/A” next to the box on the checklist. A copy of the checklist is in Appendix L. |
|---|

**Suggested
File
Category**

- **P-1-B** A Table of Contents. This should be a topical index for all categories of materials contained in the Primary file(s). In addition, separate Tables of Contents should be filed in this section for Secondary File Box(es), regional office general reference files and for material used from other inspection work papers. Copies of a Table of Contents for the Primary and Secondary Files are in **Appendix L**.
- **P-1-C** Computer disks(s), if appropriate, containing the inspection design, discussion guides, data and analysis work, final draft report, final report, and other electronic files created as part of the inspection activity.
- **P-1-D** Names and areas of responsibility of OEI regional office and headquarters staff involved in the inspection. The inside cover of the final report could be used for this purpose.
- **P-1-E** An Inspection Schedule form, which the RIG or DRIG should sign (see **Appendix L**).

The Secondary File should contain:

**Suggested
File
Category**

- **S-1-A** A Table of Contents for all secondary work papers. File a copy of this Table of Contents in the Primary File, Table of Contents section.

File P-2--Research and Preinspection Section

The Primary File should contain:

**Suggested
File
Category**

- **P-2-A** The appropriate work plan reference;

**Suggested
File
Category**

- **P-2-B** The research paper or other basis for the inspection;
- **P-2-C** Selected Background Materials;
- **P-2-D** Selected Correspondence;
- **P-2-E** Table of Contents of Materials in Secondary File(s) relating to “Research and Preinspection” activities.

The Secondary File should contain:

**Suggested
File
Category**

- **S-2-A** Supporting data such as literature searches;
- **S-2-B** Discussions with experts;
- **S-2-C** Background materials;
- **S-2-D** Preinspection correspondence;

However, if any data from the Secondary File materials relate to findings in an inspection, they should be placed in the Primary File in the Data and Analysis section.

File P-3--Inspection Design Section

The Primary File should contain:

**Suggested
File
Category**

- **P-3-A** Final inspection design and transmittal memorandum;
- **P-3-B** Minutes or notes from the Design Conference, if applicable, including a list of the participants and their office telephone numbers and related correspondence;

**Suggested
File
Category**

- **P-3-C** Copies of data collection instrument(s) used;
- **P-3-D** A description of the statistical methodology used;
- **P-3-E** The sampling plan used;
- **P-3-F** A description of the computer systems used and methods used to access these systems;
- **P-3-G** Documentation of training conducted to prepare the inspection team for field work, telephone surveying, or other data collection activities, and the data analysis, including a synopsis of the materials covered and a list of the participants;
- **P-3-H** Table of Contents of Materials in Secondary File(s) relating to “Inspection Design” activities.

The Secondary File should contain:

**Suggested
File
Category**

- **S-3-A** Documentation of activities that led up to the final design;
- **S-3-B** Copies of draft designs and comments received;
- **S-3-C** Drafts of discussion guides and sampling plans;
- **S-3-D** Complete training session materials.

However, if any data from Secondary File items relate directly to the findings in the inspection, they should be placed in the Primary File in the Data and Analysis section.

File P-4--Data and Analysis Section

The Primary File should contain:

- | | Suggested
File
Category | |
|---|--|--|
| • | P-4-A | Minutes or notes from the Entrance Conference, if we held one, including a list of participants and their office telephone numbers; |
| • | P-4-B | Minutes or notes from the Exit Conference, if we held one, including a list of participants and their office telephone numbers; |
| • | P-4-C | Summaries of interviews conducted and recorded in data collection instruments; |
| • | P-4-D | Listing of sites visited; |
| • | P-4-E | Summary of data analysis; |
| • | P-4-F | Description of data analysis procedures, including those used in accessing and downloading data on mainframe computer systems, and a copy of the computer disk(s) with a list of files used for this analysis; |
| • | P-4-G | Table of Contents of Materials in Secondary File(s) relating to “Data and Analysis” activities. |

The Secondary File should contain:

- | | Suggested
File
Category | |
|---|--|---|
| • | S-4-A | Discussion guides or other interview notes; |
| • | S-4-B | Computer printouts; |
| • | S-4-C | Data analysis work papers; |
| • | S-4-D | Correspondence and phone call documentation; |
| • | S-4-E | Copies of statutes and regulations, contracts, business or medical records. |

However, if any data from the Secondary File relate directly to the findings of the inspection, they should be placed in the Primary File in the Data and Analysis section.

File P-5--Report Section

The Primary File should contain:

- | | Suggested
File
Category |
|---|---|
| • | P-5-A Story conference documentation, if we held one, including a list of the participants; |
| • | P-5-B A copy of the final draft report and transmittal memoranda; |
| • | P-5-C A copy of the comments to the final draft report from any organization outside the regional office and disposition of those comments; |
| • | P-5-D The internal distribution list for the final draft report (see Appendix J); |
| • | P-5-E Supporting material for facts used in the final report. These can be abbreviated documents containing the specific statement or fact, which then is cross referenced to the entire document (this allows the RIG quickly to verify the accuracy of all statements and quotations in the final report); |
| • | P-5-F Cross-referenced copy of the final report or cross-reference narrative summary to show the source for all statements, quotations and facts contained in the report; |
| • | P-5-G A copy of the final report and transmittal memoranda; |
| • | P-5-H The internal and external distribution lists for the final report (see Appendix J); |
| • | P-5-I Briefing/presentation materials used in the story conference, Exit Conference, and for other briefings; |
| • | P-5-J Table of Contents of Materials in Secondary File(s) relating to “Report” activities. |

The Secondary File should contain:

- | | Suggested
File
Category |
|---|---|
| • | S-5-A Other versions of the draft report; |
| • | S-5-B Requests for copies of the final report; |
| • | S-5-C Copies of bulky presentation materials used in the story conference, Exit Conference, and for other briefings; |

File P-6--Follow-up Section

The Primary File should contain:

- | | Suggested
File
Category |
|---|--|
| • | <p>P-6-A Correspondence and other material regarding the technical follow-up to the recommendations. In addition, this section contains documentation of other actions, such as participation in meetings to present findings and recommendations, or Freedom of Information Act requests. These materials include OPDIV/STAFFDIV responses to our findings and recommendations and our disposition of those responses. Relevant materials should be forwarded from the Program Evaluation Division to the region for inclusion in the file.</p> <p>Note: Responsibility for follow-up actions regarding the recommendations rests with PED.</p> |
| • | <p>P-6-B Table of Contents of Materials in Secondary File(s) relating to “Follow-Up” activities.</p> |

The Secondary File should contain:

- | | Suggested
File
Category |
|---|---|
| • | S-6-A Materials of a more general nature or materials too voluminous to be placed in the Primary File. |

APPENDICES

APPENDIX A

List of Acronyms

AoA	Administration on Aging
ACF	Administration for Children and Families
AHCPR	Agency for Health Care Policy and Research
ASH	Assistant Secretary for Health
ASL	Assistant Secretary for Legislation
ASMB	Assistant Secretary for Management and Budget
ASPA	Assistant Secretary for Public Affairs
ASPE	Assistant Secretary for Planning and Evaluation
ATSDR	Agency for Toxic Substances and Disease Registry
CDC	Center for Disease Control and Prevention
CRC	Conflict Resolution Council
DCI	Data Collection Instrument
DIG	Deputy Inspector General
DRIG	Deputy Regional Inspector General
FDA	Food and Drug Administration
FMFIA	Federal Managers' Financial Integrity Act
FTE	Full Time Equivalent
GAO	General Accounting Office
HCFA	Health Care Financing Administration
HHS	Health and Human Services
HRSA	Health Resources and Services Administration
IDS	Impact Documentation System
IG	Inspector General
IHS	Indian Health Service
NIH	National Institutes of Health
OAS	Office of Audit Services
OEI	Office of Evaluation and Inspections
OCIG	Office of Counsel to the Inspector General
OI	Office of Investigations
OIG	Office of Inspector General
OIG/ES	Office of Inspector General Executive Secretariat
OMB	Office of Management and Budget
OMP	Office of Management and Policy
OPDIV	Operating Division
OPHS	Office of Public Health and Science
OS	Office of the Secretary
PARR	Public Affairs, Regulations, and Reports
PED	Program Evaluation Division
POD	Policy and Oversight Division
PSC	Program Support Center

RIG	Regional Inspector General
SAMHSA	Substance Abuse and Mental Health Services Administration
STAFFDIV	Staff Division
TSAR	Technical Statistical Analytical Representative
TSS	Technical Support Staff

APPENDIX B

Inspector General Act of 1978⁷

5 USC App. INSPECTOR GENERAL ACT as of June 19, 1998

Pub. L. 95-452, Oct. 12, 1978, 92 Stat. 1101, as amended by Pub. L. 96-88, title V, Sec. 508(n), Oct. 17, 1979, 93 Stat. 694; Pub. L. 97-113, title VII, Sec. 705, Dec. 29, 1981, 95 Stat. 1544; Pub. L. 97-252, title XI, Sec. 1117(a)-(c), Sept. 8, 1982, 96 Stat. 750-752; Pub. L. 99-93, title I, Sec. 150(a), Aug. 16, 1985, 99 Stat. 427; Pub. L. 99-399, title IV, Sec. 412(a), Aug. 27, 1986, 100 Stat. 867; Pub. L. 100-504, title I, Secs. 102(a)-(d), (f), (g), 104(a), 105-107, 109, 110, Oct. 18, 1988, 102 Stat. 2515-2529; Pub. L. 100-527, Sec. 13(h), Oct. 25, 1988, 102 Stat. 2643; Pub. L. 101-73, title V, Sec. 501(b)(1), title VII, Sec. 702 (c), Aug. 9, 1989, 103 Stat. 393, 415; Pub. L. 103-82, title II, Sec. 202(g)(1)-(5), Sept. 21, 1993, 107 Stat. 889, 890; Pub. L. 103-204, Sec. 23(a)(3), (4), Dec. 17, 1993, 107 Stat. 2407, 2408

Sec. 1. Short title

This Act be cited as the “Inspector General Act of 1978.”

Short Title of 1988 Amendment

Pub. L. 100-504, title I, Sec. 101, Oct. 18, 1988, 102 Stat. 2515, provided that: “This title [enacting sections 8B-8F of Pub. L. 95-452, set out in this Appendix, amending sections 2, 4-6, 8, 9, and 11 of Pub. L. 95-452, set out in this Appendix, sections 5315 and 5316 of this title, sections 405 and 1105 of Title 31, Money and Finance, and section 410 of Title 39, Postal Service, repealing sections 3521-3527 and 7138 of Title 42, The Public Health and Welfare, and section 231v of Title 45, Railroads, and enacting provisions set out as notes under sections 1, 5, 8D, 8E, and 9 of Pub. L. 95-452, set out in this Appendix] may be cited as the ‘Inspector General Act Amendments of 1988’.”

⁷ This Appendix contains an abbreviated text version of The Inspector General Act of 1978, (Amendment citations have been deleted, as well as those sections which do not pertain to the Inspector General authority for access to records. If the deleted sections, and/or the amendment citations are needed, the correct citation for electronic searches is “**5A USC Inspector General Act of 1978**”.

Sec. 6. Authority of Inspector General; information and assistance from Federal agencies; unreasonable refusal; office space and equipment

(a) In addition to the authority otherwise provided by this Act, each Inspector General, in carrying out the provisions of this Act, is authorized--

(1) to have access to all records, reports, audits, reviews, documents, papers, recommendations, or other material available to the applicable establishment which relate to programs and operations with respect to which that Inspector General has responsibilities under this Act;

(2) to make such investigations and reports relating to the administration of the programs and operations of the applicable establishment as are, in the judgment of the Inspector General, necessary or desirable;

(3) to request such information or assistance as may be necessary for carrying out the duties and responsibilities provided by this Act from any Federal, State, or local governmental agency or unit thereof;

(4) to require by subpoena the production of all information, documents, reports, answers, records, accounts, papers, and other data and documentary evidence necessary in the performance of the functions assigned by this Act, which subpoena, in the case of contumacy or refusal to obey, shall be enforceable by order of any appropriate United States district court: Provided, That procedures other than subpoenas shall be used by the Inspector General to obtain documents and information from Federal agencies;

(5) to administer to or take from any person an oath, affirmation, or affidavit, whenever necessary in the performance of the functions assigned by this Act, which oath, affirmation, or affidavit when administered or taken by or before an employee of an Office of Inspector General designated by the Inspector General shall have the same force and effect as if administered or taken by or before an officer having a seal;

(6) to have direct and prompt access to the head of the establishment involved when necessary for any purpose pertaining to the performance of functions and responsibilities under this Act;

(7) to select, appoint, and employ such officers and employees as may be necessary for carrying out the functions, powers, and duties of the Office subject to the provisions of title 5, United States Code, governing appointments in the competitive service, and the provisions of chapter 51 and subchapter III of chapter 53 of such title relating to classification and General Schedule pay rates;

(8) to obtain services as authorized by section 3109 of title 5, United States Code, at daily rates not to exceed the equivalent rate prescribed for grade GS-18 of the General Schedule by section 5332 of title 5, United States Code; and

(9) to the extent and in such amounts as may be provided in advance by appropriations Acts, to enter into contracts and other arrangements for audits, studies, analyses, and other services with public agencies and with private persons, and to make such payments as may be necessary to carry out the provisions of this Act.

(b)

(1) Upon request of an Inspector General for information or assistance under subsection (a)(3), the head of any Federal agency involved shall, insofar as is practicable and not in contravention of any existing statutory restriction or regulation of the Federal agency from which the information is requested, furnish to such Inspector General, or to an authorized designee, such information or assistance.

(2) Whenever information or assistance requested under subsection (a)(1) or (a)(3) is, in the judgment of an Inspector General, unreasonably refused or not provided, the Inspector General shall report the circumstances to the head of the establishment involved without delay.

(c) Each head of an establishment shall provide the Office within such establishment with appropriate and adequate office space at central and field office locations of such establishment, together with such equipment, office supplies, and communications facilities and services as may be necessary for the operation of such offices, and shall provide necessary maintenance services for such offices and the equipment and facilities located therein.

(d) For purposes of the provisions of title 5, United States Code, governing the Senior Executive Service, any reference in such provisions to the “appointing authority” for a member of the Senior Executive Service or for a Senior Executive Service position shall, if such member or position is or would be within the Office of an Inspector General, be deemed to be a reference to such Inspector General.

APPENDIX C

Work Plan Proposals

Example #1: Validation of Outpatient Infusion Therapy Claims

Example #2: Impediments to Peer Review Organization Sanction Activities

Example #3: Job Opportunities and Basic Skills Training Program Monitoring and Technical Assistance

Work Plan Proposal - Example 1

Title:	Validation of Outpatient Infusion Therapy Claims
Objective:	To examine a sample of claims for outpatient infusion therapy to determine the accuracy of coverage determinations and claims processing.
Description:	<p>Medicare coverage of infusion therapy (hyperalimentation, intravenous antibiotic therapy, chemotherapy, and pain management) is provided as (1) inpatient, paid for under DRGs; (2) “incident to” physicians’ office services; or (3) in the home or nursing home under the durable medical equipment (DME) and prosthetic device provisions of Part B.</p> <p>The coverage guidelines are complicated: no restrictions exist on inpatient coverage (other than those that apply to all admissions); coverage incident to physicians’ services is limited to drugs that cannot be self-administered; and home (or nursing home) infusions, except for hyperalimentation, are covered only as supplies used with a pump. Hyperalimentation is covered as a prosthetic device.</p>
Methodology:	This inspection will look at a statistically valid sample of claims and supporting documents to determine how many patients are receiving services, the duration of treatment, how much each type of therapy costs, and whether these coverage policies are being followed. We will also determine if abuses previously documented in the DME area are occurring in outpatient infusion therapy services.

Work Plan Proposal - Example 2

Title:	Impediments to Peer Review Organization Sanction Activities
Objective:	To analyze the various forces which combine to impede the peer review organization's (PRO) effectively sanctioning physicians and other providers responsible for substandard care.
Description:	<p>This inspection will examine those events, both within the PROs and outside, which affect the PROs' identifying poor care and successful completion of sanction cases.</p> <p>These include the following:</p> <ul style="list-style-type: none">▶ Review methods which first indicate problems. Are they consistent in identifying problems? Are they sensitive enough to identify subtle problems which may put the patient at risk only after discharge?▶ Categorization of problems as "substantial" or "gross and flagrant" (this varies from PRO to PRO, and can cause concern among administrative law judges and others who review cases from more than one PRO).▶ Profiling of physicians and hospitals so that patterns can be identified.▶ Confidentiality concerns - are they legitimate or an excuse to protect a poor physician?
Methodology:	Methods include interviews with PROs, including those that have successfully pursued sanctions, those who have submitted recommendations which have been rejected, and those which have never submitted a recommendation for sanction. The relevant literature will be reviewed and other interested parties interviewed.

Work Plan Proposal - Example 3

Title:	Job Opportunities and Basic Skills Training Program Monitoring and Technical Assistance
Objective:	This inspection will examine ACF's monitoring of and technical assistance to the States on implementing the Job Opportunities and Basic Skills Training (JOBS) program to determine the effectiveness of the internal processes and identify vulnerabilities.
Background:	<p>The JOBS program was a major revision in the income maintenance system and created significant planning and implementing challenges for many States. As of October 1990, all States had established their JOBS program, with the majority operating statewide. States were required to submit a State JOBS plan that specifies how the State intends to implement the program by October 1, 1990, and are required to review and update the plan by July 1, 1992.</p> <p>Although they are well on their way in implementing the program, States report difficulties as they adjust their programs to meet new requirements and move in new directions. A recent GAO study reported that States are having difficulty meeting targeting and participation requirements, primarily on the conditions, tasks, and procedures related to achieving these requirements.</p> <p>The OFA provides technical assistance directly through a variety of mechanisms and recently completed field reviews of all States identified as a monitoring/technical assistance effort. Additionally, it has let a 3-year, \$6 million contract with the National Alliance of Business to provide additional technical assistance to the States.</p>
Description:	This inspection will be an oversight review of OFA's monitoring of and technical assistance to States for the JOBS program, including how it is assessing and ensuring compliance with the regulations, and the process, outcomes, and effect of its technical assistance initiatives.
Methodology:	This inspection will review the policies and processes developed by headquarters for monitoring and processes and outcomes for providing technical assistance; it will also survey the regional offices to identify their role in providing technical assistance; and it will survey a sample of States to identify their perspectives on issues relating to monitoring and technical assistance.

APPENDIX D

Measuring Qualitative OIG Impact

CONSUMER PROTECTION

- Increase Consumer Safety**
- Improve Quality Care**
- Increase Consumer Access**

IMPROVE PROGRAM OPERATIONS

- Improve Efficiency, Effectiveness**
- Reduce Fraud and Abuse Vulnerability**
- Increase Coordination**
- Improve Controls**
- Increase Compliance**
- Improve Reporting**

SAVE TAXPAYERS MONEY

- Capture Recoveries**
- Document Savings**

ENFORCE LAWS

- Convict Criminals**
- Exclude Bad Providers**
- Settle Civil Judgments**

PROVIDE GUIDANCE

- Issue Advisory Opinions**
- Propose Safe Harbors**
- Establish Corporate Integrity Plans**

Measuring Qualitative OIG Impact

Definition of Terms

Types of Impact:

- A. **Consumer Protection:** Impact which benefits the consumers of the Department's services in one of the following ways:
4. **Increase Consumer Safety:** Following OIG recommendations, ACF took actions to ensure a healthier and safer child care environment.
 5. **Improve Quality Care:** As a result of OIG work, PHS has undertaken efforts to examine mis-medication among the elderly.
 6. **Increase Consumer Access:** In response to an OIG report, HRSA's Bone Marrow Donor registry improved contracting to recruit and retain more minority donors.
- B. **Improve Program Operations:** Impact which results in improved program operations in one of the following ways:
1. **Improve Efficiency, Effectiveness:** OCSE is using OIG reports on paternity establishment to design technical assistance documents and model forms to facilitate replication of best practices in paternity establishment by child support agencies.
 2. **Reduce Fraud and Abuse Vulnerability:** Following OIG recommendations HCFA implemented a new policy to facilitate the Medicare beneficiary complaint process.
 3. **Increase Coordination:** In response to OIG recommendations, AoA and the USDA have engaged in cooperative efforts to increase meal service delivery to the elderly without increasing Federal or State expenditures.
 4. **Improve Controls:** In response to an OIG report, Texas issued guidance to child placing agencies on meeting licensing standards for foster care homes and has increased monitoring of the homes used by child placing agencies.
 5. **Increase Compliance:** Through the development of performance measures, recommended by OIG, AoA will be able to meet the congressional mandate to report on project outcomes and to compare individual projects.
 6. **Improve Reporting:** Based on OIG findings, HRSA undertook efforts to improve hospital reporting of adverse actions taken against doctors.

POTENTIAL ACTION REPORT - Example [Submit with the design, working draft, and draft]

ISSUE	POTENTIAL ACTION	POTENTIAL IMPLICATIONS
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<i>Head Start/Child Care Collaboration</i>	As a result of work in this issue area, OIG will assist the Department in their efforts to facilitate collaboration between the Head Start and Child Care programs to provide wrap-around services.	<i>Increase Coordination Improve Efficiency and Effectiveness:</i> Through increased Head Start/Child Care collaboration, HHS will be able to serve the child care needs of families more efficiently. <i>Increase Consumer Access:</i> Through increase availability of wrap-around services, families will be better able to access quality child care services during their working hours.
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POTENTIAL ACTION REPORT [Submit with the design, working draft and draft]

ISSUE	POTENTIAL ACTION	POTENTIAL IMPLICATIONS
-------	------------------	------------------------

ANTICIPATED ACTION REPORT [Completed by Headquarters when Final Report is Issued]		
REPORT AND IMPACT	ANTICIPATED ACTION	ANTICIPATED IMPLICATIONS
<i>Grantees & Providers Delinquent in Child Support</i> Department will take action to ensure that child support obligors receiving Department funds are current in their child support payments.	<i>Practice Change</i> As a result of our report that identified HHS grantees and providers who owed some \$21.5 million in back child support, the Department will implement a plan to ensure that no individual receiving HHS funds is in arrears in their child support.	<i>Increase Consumer Access Increase Compliance</i> As a result of the Department's efforts to ensure that individuals receiving HHS funds are current in their child support payments, the children of these obligors will receive the support they are due through the IV-D system.
<i>State Child Care Certificate System: An Early Assessment of Vulnerabilities and Barriers</i> Department will provide parents with more information to choose quality child care providers.	<i>Practice Change</i> As a result of our report describing a lack of information available to consumers choosing child care providers, the Administration for Children and Families will develop a guide to assist parents to select quality child care providers and a brochure for states on improving consumer education to parents.	<i>Increase Consumer Access</i> Parents will have more information available to them to make informed choices in selecting quality child care providers for their children.
<i>National Marrow Donor Registry: Progress in Minority Recruitment</i> HRSA Bone Marrow Donor Registry will improve contracting to recruit and retain more minority donors.	<i>Policy Change</i> In response to our recommendations, HRSA will require donor centers and recruitment groups to meet performance indicators in recruiting and retaining donors from racial and ethnic minority groups. It will also phase out inefficient cost reimbursement contracts and tie payment to donor center performance.	<i>Increase Consumer Access Improve Controls Improve Efficiency and Effectiveness</i> More minorities will be able to receive bone marrow treatments for conditions such as certain leukemia and other cancers.

ACTION REPORT [Completed by Headquarters when Actions are Implemented after the Final Report is Issued]		
REPORT AND IMPACT	ACTION TAKEN	IMPLICATIONS
<i>Grantees & Providers Delinquent in Child Support</i> Department takes action to ensure that child support obligors receiving Department funds are current in their child support payments.	<i>Practice Change</i> As a result of our report that identified HHS grantees and providers who owed some \$21.5 million in back child support, the Department has established agency action plans to ensure that no individual receiving HHS funds is in arrears in their child support. Source:	<i>Increase Consumer Access Increase Compliance</i> As a result of the Department's efforts to ensure that individuals receiving HHS funds are current in their child support payments, the children of these obligors will receive the support they are due through the IV-D system.
<i>State Child Care Certificate System: An Early Assessment of Vulnerabilities and Barriers</i> Department provides parents with more information to choose quality child care providers.	<i>Practice Change</i> As a result of our report describing a lack of information available to consumers choosing child care providers, the Administration for Children and Families developed a guide to assist parents to select quality child care providers and a brochure for states on improving consumer education to parents. Source:	<i>Increase Consumer Access</i> Parents will have more information available to them to make informed choices in selecting quality child care providers for their children.
<i>National Marrow Donor Registry: Progress in Minority Recruitment</i> HRSA Bone Marrow Donor Registry improves contracting to recruit and retain more minority donors.	<i>Policy Change</i> Based in significant part on our recommendations, HRSA's new contract to operate the registry requires that donor centers and recruitment groups meet performance indicators in recruiting and retaining donors from racial and ethnic minority groups. It is phasing out inefficient cost reimbursement contracts and will tie payment to donor center performance. Source:	<i>Increase Consumer Access Improve Controls Improve Efficiency and Effectiveness</i> More minorities will be able to receive bone marrow treatments for conditions such as certain leukemia and other cancers.

Checklist for Developing Impact Oriented Work Plan Proposals

I. Environmental Items: What's Happening and Who Cares?

OIG Mission

- G Do we have legal authority to review the issue?
- F HHS dollars involved?
- F Oversight/management issue?
- G Consistent with the OIG mission?
- G Consistent with the OEI mission?

Audience

- G HHS primary and secondary audience(s)?
- G Audience(s) interested in the study idea?
- G Did the idea originate from an HHS program official?
- F Formal or informal request?

Timeliness

- G Best time to conduct an inspection on this issue?
- G Upcoming programmatic changes on the horizon?
- G Related legislative activity?
- G Does the issue address OEI, OIG, HHS or congressional priorities?
- G Is the issue "ripe"?

Relationship to Other Work: Duplicative or Complementary?

- G Prior OEI reports?
- G Prior or ongoing work planning proposals?
- G Related work?
 - F Office of Audit Services
 - F OIG investigative activities
 - F Office of Counsel to the Inspector General/compliance activities
 - F GAO
 - F ASPE grants
 - F Operating division research/grants
 - F Private research organizations
 - F Industry
- G How does the issue expand on or duplicate work by these groups?

II. Focusing the Proposal: What is the question to be answered? How are we going to get our data?

The Problem

- G** What is the specific question?
- G** Is it solvable?

Program Background

- G** Magnitude or significance of the program or issue?
 - F** Level of program expenditures?
 - F** Extent of the program's impact on the public?
 - F** Extent to which the beneficiaries are impacted?
 - F** Importance to the mission of HHS?
 - F** Program integrity or material weakness?
 - F** Vulnerability to fraud and abuse?
 - F** Emerging issue?
 - F** Persistent operational or management problem?
- G** Program structure?
- G** If a request, do you have additional background?
- G** Relevant statutes, regulations and policy guidance?
- G** Agency that administers the program?
- G** How is the program administered?
 - F** Direct Federal?
 - F** Federal/State?
 - F** Grants?
- G** Program funding structure?

Methods

- G** Sufficiently narrow scope with a manageable number of objectives?
- G** An effective methodology to answer the study questions?
- G** Reasonably accessible data to answer the study questions?
- G** Significant methodological constraints, limitations or concerns about data reliability in answering the study questions?
- G** Is the data "credible?"
- G** Are the methods designed to produce a timely OEI product?

III. Expected Impact: What is the potential outcome of the report?

Types

- G** Program recommendations?
 - F** Monetary?
 - F** Programmatic?
- G** Impact on beneficiaries?
- G** Brings new data to the attention of decision makers?
- G** Describes the scope or extent of a problem?
- G** Will audience use information from this inspection?
- G** Likelihood that agency/HHS/Congress will take action to solve the identified problems?

APPENDIX E

Start Notice - Example

[USE OIG MEMORANDUM PAPER]

Date: [DATE]

From: [NAME]

Subject: Planned [Month] Start of New Inspection: [Title of Inspection]. [OEI Control Number]

To: Audit Liaison, [Name]

Assignment: To examine effective State and county initiatives to meet the maintenance of effort requirement of the Job Opportunities and Basic Skills Training (JOBS) program.

OIG-OEI Headquarters' and/or Region: Region [Number] will lead the project with the assistance from [whomever is assisting].

Background and General Description of Work: The JOBS program prohibits using JOBS funds to supplant non-Federal funds for existing services and activities. JOBS [rest of paragraph deleted].

This study will examine how States are identifying and utilizing existing services and activities.

Where Work Will Be Done: Work will be done in a sample of States and counties.

Program Specialist: [Name]

cc:
DIG - OAS
DIG - OI
PARR
Region [Number]

APPENDIX F

Technical Support Staff

Requests for assistance from the Technical Support Staff (TSS) should be in writing. While we require no specific format, include the following

- ▶ inspection number,
- ▶ title of inspection,
- ▶ Project Leader,
- ▶ Program Specialist,
- ▶ approximate due date for the request, and
- ▶ description of the work requested (be fairly specific).

Initiate the request as soon as possible in the inspection process to alleviate potential delays. Send the request either through the regular mail or via electronic mail to TSS, with a copy to the Program Specialist and PED Director.

This requirement does not prevent informal discussion between TSS and project staff. Project Leaders and Program Analysts should consult with TSS members as needed. However, once the Project Leader decides what service or information is required, he or she must send a written request to TSS and the appropriate Program Specialist. The date of receipt of the request will constitute the start date for the work undertaken by the TSS members.

This process will help TSS manage its workload and provide a record for both TSS and the inspection work paper files.

APPENDIX G

Material Weakness

DEFINITION OF MATERIAL WEAKNESS

A material weakness is a specific instance of noncompliance with the Federal Managers' Financial Integrity Act (FMFIA) of sufficient importance to be reported to the President and the Congress. Such weaknesses would significantly impair the fulfillment of an agency component's mission; deprive the public of needed services; violate statutory or regulatory requirements; significantly weaken safeguards against waste, loss, unauthorized use or "misappropriation of funds, property, or other assets; or result in a conflict of interest."

Many factors must be considered in deciding if we should classify a weakness as material. From the departmental standpoint, the key factors that we must evaluate are listed below. Generally any positive response to any question should alert the appropriate Internal Controls Officers that we should classify the weakness as a "material weakness" for purposes of reporting in the Secretary's Annual FMFIA Report to the President and the Congress unless his/her professional judgment can support a different decision.

1. Does the weakness significantly impair the fulfillment of an OPDIV/STAFFDIV agency mission?
2. Does the weakness deprive the public of needed services?
3. Does the weakness violate statutory or regulatory requirements?
4. Does the weakness significantly affect the safeguards against waste, loss, unauthorized use of funds, property, or other resources?
5. Does the weakness result in a conflict of interest?
6. Is the weakness of high political sensitivity such that it could result in embarrassment to the Department?
7. Is the weakness a crosscutting weakness that indicates major systemic problems?
8. Is the real or potential dollar loss associated with the weakness of significant magnitude to affect judgment in decision-making?
9. Is the weakness so important that it otherwise warrants reporting to the President and the Congress?

PROCEDURE TO FOLLOW

When we identify an issue as a potential material weakness, the following steps should take place.

1. The regional office and PED staff responsible for the inspection will prepare a short, self-contained draft memo that outlines the material weakness and the reasons for this designation based on OMB criteria. The memo goes to PED.
2. The PED will discuss the material weakness with the Office of Audit Services prior to briefing the DIG to ensure the appropriateness of the material designation.
3. The PED will submit the draft memo to the DIG for review. The DIG will decide whether we should identify the finding as a material weakness. On occasion the PED staff will meet with the DIG to discuss the determination. It is the PED staff's responsibility to brief and defend the decision.
4. After the DIG and OAS agree that the finding is a material weakness, the memo is prepared in final. The memo is then sent to the DIG, OAS for signature. Then the memo is forwarded to the head of the program being reviewed and the Management Oversight Council with copies to the OPDIV's Internal Control Officer. Most often, this memo should precede the draft report.
5. We invite the OPDIV to discuss the memo with us.
6. Then, if we continue to believe that a material weakness exists when we prepare the draft report, we must do the following:
 - ▶ Clearly indicate at the beginning of the report that we believe the finding is material and state our reasons.
 - ▶ Specifically state that we should report the finding to the President and the Congress and that a corrective action plan should be developed. The OPDIV's response to our draft report should include their concurrence or nonconcurrence, not only with the finding, but also with the materiality of the finding.
 - ▶ Include a detailed corrective action plan with specific steps the OPDIV will take to correct the weakness and anticipated dates for implementing the changes

The cover memo transmitting the report should also request a direct and specific response to the materiality of the finding.

The language in our report ***must*** leave no doubt that we have identified what we believe is a material weakness. Suggested language could be as follows:

We believe that [finding] is not in compliance with the FMFIA, Public Law 97-255, and should be reported as a material weakness through the Secretary to the President and the Congress in accordance with the Office of Management and Budget Circular A-123. We recommend that the Operating Division report this material weakness to the Secretary and start developing and implementing a corrective action plan.

Both the OPDIV's Internal Control Officer and the Management Oversight Council should always receive a copy of every report in which we have identified a material weakness.

7. The OPDIV must respond to our draft report regarding their concurrence or nonconcurrence with the materiality of the weakness. If they concur, they should also describe their intended corrective actions, a schedule for corrective action, and an explanation of how their actions will correct the problem. We should incorporate their response into the Findings section of our final report.

QUARTERLY FOLLOW-UP

The PED will send the headquarters OAS a list of all material weaknesses identified on OEI reports once each quarter. The list will include those weaknesses that have not been corrected and a detailed status report on the specific steps that have been taken to correct the problem. The PED staff is responsible for follow-up and providing the necessary information to OEI senior management, including the region on these items as with other recommendations made in our reports.

APPENDIX H

Report Covers and Section Formats

**[Example of Front Cover and Inside Page
Working Draft Report to Review Team]**

**NOTE: Titles should be entered with Initial Caps
Title Page is the Same as the Cover
Print 2 copies of Cover Page**

Department of Health and Human Services

**OFFICE OF
INSPECTOR GENERAL**

**Working
DRAFT**

Marketing of Incontinence Supplies



**JUNE GIBBS BROWN
Inspector General**

**JULY 1994
OEI-03-94-00770**

OFFICE OF INSPECTOR GENERAL

The mission of the Office of Inspector General (OIG), mandated by Public Law 95-452, as amended by Public Law 100-504, is to protect the integrity of the Department of Health and Human Services programs as well as the health and welfare of beneficiaries served by them. This statutory mission is carried out through a nationwide program of audits, investigations, inspections, sanctions, and fraud alerts. The Inspector General informs the Secretary of program and management problems and recommends legislative, regulatory, and operational approaches to correct them.

Office of Evaluation and Inspections

The Office of Evaluation and Inspections (OEI) is one of several components of the Office of Inspector General. It conducts short-term management and program evaluations (called inspections) that focus on issues of concern to the Department, the Congress, and the public. The inspection reports provide findings and recommendations on the efficiency, vulnerability, and effectiveness of departmental programs.

OEI's Philadelphia Regional Office prepared this report under the direction of Joy Quill, Regional Inspector General and Robert A. Vito, Deputy Regional Inspector General. Principal OEI staff included:

REGION

Robert A. Katz, *Project Leader*
Linda M. Ragone, *Program Analyst*
Robert A. Baiocco, *Program Analyst*
Cynthia Hansford, *Administrative Staff*

HEADQUARTERS

Thomas A. Noplock, *Program Specialist*
Richard P. Lyons, *Office of Audit Services*
Linda M. Moscoe, *Technical Support Staff*
Brian P. Ritchie, *Technical Support Staff*
Barbara Tedesco, *Technical Support Staff*

**[Example of Front Cover and Inside Page
Draft Report to Review Team]**

**NOTE: Enter Titles with Initial Caps
Title Page is the Same as the Cover
Print 2 copies of Cover Page**

Department of Health and Human Services

**OFFICE OF
INSPECTOR GENERAL**

DRAFT

Marketing of Incontinence Supplies

JUNE GIBBS BROWN - INSPECTOR GENERAL

NOTICE - THIS DRAFT RESTRICTED TO OFFICIAL USE

This document is a draft report of the Office of Inspector General and is subject to revision; therefore, recipients of this draft should not disclose its contents for purposes other than for official review and comment under any circumstances. This draft and all copies thereof remain the property of, and must be returned on demand to, the Office of Inspector General.

DECEMBER 1994

OEI-03-94-00770

OFFICE OF INSPECTOR GENERAL

The mission of the Office of Inspector General (OIG), mandated by Public Law 95-452, as amended by Public Law 100-504, is to protect the integrity of the Department of Health and Human Services programs as well as the health and welfare of beneficiaries served by them. This statutory mission is carried out through a nationwide program of audits, investigations, inspections, sanctions, and fraud alerts. The Inspector General informs the Secretary of program and management problems and recommends legislative, regulatory, and operational approaches to correct them.

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Brian P. Ritchie, *Technical Support Staff*
Barbara Tedesco, *Technical Support Staff*

**[Example of Front Cover and Inside Page
Final Report to Review Team]**

**NOTE: Enter Titles with Initial Caps
Title Page is the Same as the Cover
Print 2 copies of Cover Page**

Department of Health and Human Services

**OFFICE OF
INSPECTOR GENERAL**

Marketing of Incontinence Supplies



**JUNE GIBBS BROWN
Inspector General**

**DECEMBER 1994
OEI-03-94-00770**

OFFICE OF INSPECTOR GENERAL

The mission of the Office of Inspector General (OIG), mandated by Public Law 95-452, as amended by Public Law 100-504, is to protect the integrity of the Department of Health and Human Services programs as well as the health and welfare of beneficiaries served by them. This statutory mission is carried out through a nationwide program of audits, investigations, inspections, sanctions, and fraud alerts. The Inspector General informs the Secretary of program and management problems and recommends legislative, regulatory, and operational approaches to correct them.

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Barbara Tedesco, *Technical Support Staff*

To obtain copies of this report, please call the Philadelphia Regional Office at (800) 531-9562.
Reports are also available on the World Wide Web at our home page address:
<http://www.dhhs.gov/progorg/oei>

Report Section Formats

The following instructions will be deleted from this manual, once the experimental report formatting test is completed and approved as a permanent process (see page 21).

The following Report Titles should be used in Inspection Reports. The Alt Q macro will produce the appropriate format for the Title and for the page footer.

EXECUTIVE SUMMARY

INTRODUCTION

FINDINGS

RECOMMENDATIONS

APPENDIX

[Enter Appropriate Appendix Letter when Prompted]

The Report text will also use sectional headings under these titles. Use the ALT Q macro “Text”, “Heading” to produce appropriate Heading text font and format. Enter Sectional Headings in all uppercase type. Examples of these sectional headings are:

PURPOSE

BACKGROUND

METHODOLOGY

Use appropriate subheadings for clarity. Use the ALT Q macro “Text,” “Subheading” to produce appropriate subheading text and format. Enter Subheadings with initial caps. An example of a subheading is:

Payment Policy

APPENDIX I

Transmittal Memoranda and Documents

LIST OF TRANSMITTALS NEEDED FOR DRAFT REPORTS

Working Draft Report to the Review Team

The following page contains an example of

- a cover memo - Working draft report to the review team (I-3),

Draft Report to the Review Team

The following pages contain examples of

- a cover memo - Referring memorandum draft report to the review team (I-4),
- a one-page transmittal memorandum to an OPDIV/STAFFDIV (I-5),
- a morning report with a body no longer than 8 - 10 lines (I-6).

Draft Report to the IG for Approval

The following pages contain examples of

- a memo to the DIG (I-7),
- a one-page transmittal memorandum to an OPDIV/STAFFDIV (I-8),
- a one-page transmittal memorandum to one OPDIV/STAFFDIV for comment with an information copy to multiple OPDIVs/STAFFDIVs (I-9),
- a two-page transmittal memorandum to multiple OPDIVs/STAFFDIVs for comment (I-10 - I-11),
- a morning report with a body no longer than 8 - 10 lines (I-12),
- a checklist for submitting draft reports to headquarters for IG approval (I-13).

Referring Memorandum Working Draft Report to the Review Team

[USE OIG OR REGIONAL OFFICE MEMORANDUM FORMAT]

[DATE]

[NAME]

Regional Inspector General for
Evaluation and Inspections

OIG Working Draft Report: ["TITLE"], [OEI INSPECTION NUMBER]

[NAME]

Deputy Inspector General for
Evaluation and Inspections

Attached is the working draft inspection report on. . . .

If you or your staff have any questions or comments, please call me or [PROJECT LEADER] at
[(AREA CODE)] [TELEPHONE NUMBER].

Attachments

cc:

[Name], Senior Advisor to the DIG

[Name], Director, PED

[Name], Associate Director, PED

[Name], Technical Support Staff

[Name], Program Specialist

[Name], Program Analyst, POD (cover memo only)

Referring Memorandum Draft Report to the Review Team

[USE OIG OR REGIONAL OFFICE MEMORANDUM FORMAT]

[DATE]

[NAME]

Regional Inspector General for
Evaluation and Inspections

OIG Draft Report: [“TITLE”], [OEI INSPECTION NUMBER]

[NAME]

Deputy Inspector General for
Evaluation and Inspections

Attached is the draft inspection report on . . . , the appropriate transmittal memoranda and the morning report.

If you or your staff have any questions or comments, please call me or [PROJECT LEADER] at [(AREA CODE)] [TELEPHONE NUMBER].

Attachments

cc:

[Name], Senior Advisor to the DIG

[Name], Director, PED

[Name], Associate Director, PED

[Name], Technical Support Staff

[Name], Program Specialist

[Name], Program Analyst, POD (cover memo only)

**Transmittal to OPDIV/STAFFDIV
Draft Report to the Review Team**

[USE WHITE BOND PAPER]

June Gibbs Brown
Inspector General

OIG Draft Report: [“TITLE”], [OEI INSPECTION NUMBER]

[NAME OF OPDIV/STAFFDIV HEAD]
[TITLE]

Attached for your review and comment is our draft inspection report on. . . .

Our inspection revealed that. . . .

We recommend that. . . .

We would appreciate receiving your comments on the draft report within 45 days of the date of this memorandum.

If you have any questions or comments about this report, please call me or [NAME], Deputy Inspector General for Evaluation and Inspections, or have your staff contact [DIRECTOR, PED] at [(AREA CODE)] [TELEPHONE NUMBER].

Attachment

cc:
[Name], Title

[USE WHITE BOND PAPER]

References: OEI-07-90-02250 **Contact:** [DIRECTOR, PED]
(AREA CODE) [TELEPHONE NUMBER]

[Note: The body of the morning report generally should not exceed more than 8 - 10 lines. To achieve this standard, the findings and recommendations may have to be summarized.]

(*) Morning reports for a draft report should usually be marked “No.”

**Referring Memorandum
Draft Report to the DIG
Draft Report to the IG**

[USE OIG OR REGIONAL OFFICE MEMORANDUM FORMAT]

[DATE]

[NAME]

Regional Inspector General for
Evaluation and Inspections

OIG Draft Report: [“TITLE”], [OEI INSPECTION NUMBER]

[NAME]

Deputy Inspector General for
Evaluation and Inspections

Attached are our draft report on . . . , the appropriate transmittal memoranda, and the morning report.

[Program Specialist’s Name] notified us that this report is ready for the Inspector General’s approval. We forwarded a separate package to the Policy and Oversight Division with 25 copies of the report and appropriate disk files.

If you or your staff have any questions or comments, please call me or [PROJECT LEADER] at [(AREA CODE)] [TELEPHONE NUMBER].

Attachments

cc:

[Name], Senior Advisor to the DIG

[Name], Director, PED

[Name], Associate Director, PED

[Name], Technical Support Staff

[Name], Program Specialist

[Name], Program Analyst, POD (cover memo only)

**Transmittal to OPDIV/STAFFDIV
Draft Report to the IG**

[USE WHITE BOND PAPER]

June Gibbs Brown
Inspector General

OIG Draft Report: [“TITLE”], [OEI INSPECTION NUMBER]

[NAME OF OPDIV/STAFFDIV HEAD]
[TITLE]

Attached for your review and comment is our draft inspection report on. . . .

Our inspection revealed that. . . .

Our findings demonstrate that. . . .

We recommend that. . . .

We would appreciate receiving your comments on the draft report within 45 days of the date of this memorandum.

If you have any questions about this report, please call me or [NAME], Deputy Inspector General for Evaluation and Inspections, or have your staff contact [DIRECTOR, PED] at [(AREA CODE)] [TELEPHONE NUMBER].

Attachment

**Transmittal to One OPDIV/STAFFDIV for Comment
with an Information Copy to
Multiple OPDIVs/STAFFDIVs--
Draft Report to the IG**

[USE WHITE BOND PAPER]

June Gibbs Brown
Inspector General

OIG Draft Report: [“TITLE”], [OEI INSPECTION NUMBER]

[NAME OF OPDIV/STAFFDIV HEAD]
[TITLE]

Attached for your review and comment is our draft inspection report on. . . .

Our inspection revealed that. . . .

We recommend that. . . .

We would appreciate receiving your comments on the draft report within 45 days of the date of this memorandum.

If you have any questions or comments about this report, please call me or [NAME], Deputy Inspector General for Evaluation and Inspections, or have your staff contact [DIRECTOR, PED] at [(AREA CODE)] [TELEPHONE NUMBER].

Attachment

cc:
[NAME OF OPDIV/STAFFDIV HEAD]
[OPDIV/STAFFDIV HEAD TITLE]

[NAME OF OPDIV/STAFFDIV HEAD]
[OPDIV/STAFFDIV HEAD TITLE]

**Transmittal to Multiple OPDIVs/STAFFDIVs
for Comment with an Information Copy to
Multiple OPDIVs/STAFFDIVs--
Draft Report to the IG**

[USE WHITE BOND PAPER]

June Gibbs Brown
Inspector General

OIG Draft Report: [“TITLE”], [OEI INSPECTION NUMBER]

See Attached Addressees List

Attached for your review and comment is our draft inspection report on. . . .

Our inspection revealed that. . . .

Our findings demonstrate that. . . .

We recommend that. . . .

We would appreciate receiving your comments on the draft report within 45 days of the date of this memorandum.

If you have any questions about this report, please call me or [NAME], Deputy Inspector General for Evaluation and Inspections, or have your staff contact [DIRECTOR, PED] at [(AREA CODE)] [TELEPHONE NUMBER].

Attachment

cc:

[Name], Title

[Name], Title

Second Page of Memo to Multiple OPDIVs/STAFFDIVs

[USE WHITE BOND PAPER]

Addressees:

[NAME OF OPDIV/STAFFDIV HEAD]
[OPDIV/STAFFDIV HEAD TITLE]

[NAME OF OPDIV/STAFFDIV HEAD]
[OPDIV/STAFFDIV HEAD TITLE]

[NAME OF OPDIV/STAFFDIV HEAD]
[OPDIV/STAFFDIV HEAD TITLE]

Morning Report

Draft Report to the IG

[USE WHITE BOND PAPER]

Morning Mail: Yes **X**No (*)

Title: Mobile Health Services

References: OEI-05-89-01331 **Contact:** [DIRECTOR, PED]
(AREA CODE) [TELEPHONE NUMBER]

We released a draft inspection report on mobile health services. We did this inspection in response to a request from Congress. The report describes various types of mobile health services, their quality, and the degree of regulation. We found that (1) providers deliver a wide variety of health services in mobile settings, but their prevalence is difficult to determine; (2) regulation varies widely and for some services is non-existent; and (3) mobile health services can improve access to care. However, there are questions related to quality and cost. We recommend that the Public Health Service (PHS) work with States to develop a process to identify emerging mobile health services and their providers. We also recommend that PHS and the Health Care Financing Administration develop priorities and protocols for regulating mobile health services.

[Note: The body of the morning report generally should not exceed more than 8 - 10 lines. To achieve this standard, the findings and recommendations may have to be summarized.]

(*) Morning reports for a draft report should usually be marked “No.”

Checklist For Submitting Reports to Headquarters For IG Approval

REPORT #/TITLE: _____

Final Draft Report

CHECK (✓) EACH ITEM WHEN COMPLETED

- _____ 25 copies of report(s) to Washington (unstapled, no blue back cover)
- _____ 10 copies of report(s) (stapled, with blue back cover)
 - _____ Baltimore (If health care issue)
- OR
- _____ Washington (If non health care issue)
- _____ 2 camera-ready copies of report(s)
- _____ A 3-1/2" diskette containing:
 - _____ Memo to OPDIV(s)
 - _____ Letter to outside agency(ies) (If requesting agency comments)
 - _____ Morning report
- _____ A hard copy of everything on the diskette
- _____ A copy of transmittals, report(s), and a morning report for each review team member:
 - _____ George Grob
 - _____ Robert Brown
 - _____ Mary Beth Clarke
 - _____ Susan Burbach or Stuart Wright (Circle one)
 - _____ Program Specialist
 - _____ TSS

SUBMITTED BY: _____ DATE SUBMITTED: _____

8/6/98

LIST OF TRANSMITTALS NEEDED FOR FINAL REPORTS

Final Report to the Review Team

The following pages contain examples of

- a memo to the review team (I-15),
- a one-page transmittal memorandum to an OPDIV/STAFFDIV (I-16),
- a morning report with a body no longer than 8 - 10 lines (I-17).

Final Report to the IG for Approval

The following pages contain examples of

- a memo to the DIG (I-18),
- a one-page transmittal memorandum to an OPDIV/STAFFDIV (I-19),
- a morning report with a body no longer than 8 - 10 lines (I-20),
- a checklist for submitting final reports to headquarters for IG approval (I-21).

Referring Memorandum Final Report to the Review Team

[USE OIG OR REGIONAL OFFICE MEMORANDUM FORMAT]

[DATE]

[NAME]

Regional Inspector General for
Evaluation and Inspections

OIG Final Report: [“TITLE”], [OEI INSPECTION NUMBER]

[NAME]

Deputy Inspector General for
Evaluation and Inspections

Attached are the final inspection report on . . . , the appropriate transmittal memoranda, and the morning report.

If you or your staff have any questions or comments, please call me or [PROJECT LEADER] at [(AREA CODE)] [TELEPHONE NUMBER].

Attachments

cc:

[Name], Senior Advisor to the DIG

[Name], Director, PED

[Name], Associate Director, PED

[Name], Technical Support Staff

[Name], Program Specialist

[Name], Program Analyst, POD (cover memo only)

**Transmittal to OPDIV/STAFFDIV--
Final Report to the Review Team**

[USE WHITE BOND PAPER]

June Gibbs Brown
Inspector General

OIG Final Report: [“TITLE”], [OEI INSPECTION NUMBER]

[NAME OF OPDIV/STAFFDIV HEAD]
[TITLE]

Attached for your review and comment is our final inspection report on. . . .

Please submit within 60 days your plan to implement the recommendations or explain why it is not possible to do so. If you have any questions, please call me or [NAME], Deputy Inspector General for Evaluation and Inspections, or have your staff contact [DIRECTOR, PED] at [(AREA CODE)] [TELEPHONE NUMBER].

Attachment

[**Note:** If no recommendations are made in the report and the report is being issued directly in final, the last paragraph should be replaced with the following:]

This report is being issued directly in final since it contains no recommendations. You are not required to comment on the report. However, if you have any questions or comments, please call me or [NAME], Deputy Inspector General for Evaluation and Inspections, or have your staff contact [DIRECTOR, PED] at [(AREA CODE)] [TELEPHONE NUMBER].

Morning Report

Final Report to the Review Team

[USE WHITE BOND PAPER]

Morning Mail: X Yes (*) No

Title: Child Support and the Military

References: OEI-07-90-02250 **Contact:** [DIRECTOR, PED]
(AREA CODE) [TELEPHONE NUMBER]

We released a final inspection report on child support and the military. States do not collect child support payments in more than half of the military cases which we sampled. Locating absent parents is the greatest barrier to collections. The Aid to Families with Dependent Children and Medicaid programs could save a projected \$54.1 million annually by locating absent parents and establishing and enforcing court orders. We recommend that ACF provide technical support to State Child Support Enforcement offices and collaborate with the Social Security Administration to develop a better mechanism for obtaining Social Security numbers for military absent parents. The ACF, the Social Security Administration, and the Assistant Secretary for Planning and Evaluation concurred with our recommendations.

[Note: The body of the morning report generally should not exceed more than 8 - 10 lines. To achieve this standard, the findings and recommendations may have to be summarized.]

(*) Morning reports for a final report should usually be marked “Yes.”

**Referring Memorandum
Final Report to the DIG
Final Report to the IG**

[USE OIG OR REGIONAL OFFICE MEMORANDUM FORMAT]

[DATE]

[NAME]

Regional Inspector General for
Evaluation and Inspections

OIG Final Report: [“TITLE”], [OEI INSPECTION NUMBER]

[NAME]

Deputy Inspector General for
Evaluation and Inspections

Attached are the final inspection report on . . . , the appropriate transmittal memoranda, and the morning report.

[Program Specialist’s Name] notified us that this report is ready for the Inspector General’s approval. We forwarded a separate package to the Policy and Oversight Division with 25 copies of the report and appropriate disk files.

If you have any questions or comments, please call me or [PROJECT LEADER] at [(AREA CODE)] [TELEPHONE NUMBER].

Attachments

cc:

[Name], Senior Advisor to the DIG
[Name], Director, PED
[Name], Associate Director, PED
[Name], Technical Support Staff
[Name], Program Specialist
[Name], Program Analyst, POD (cover memo only)

**Transmittal to OPDIV/STAFFDIV
Final Report to the IG**

[USE WHITE BOND PAPER]

June Gibbs Brown
Inspector General

OIG Final Report: [“TITLE”], [OEI INSPECTION NUMBER]

[NAME OF OPDIV/STAFFDIV HEAD]
[TITLE]

Attached is our final inspection report on. . . .

Please submit within 60 days your plan to implement the recommendations or explain why it is not possible to do so. If you have any questions, please call me or [NAME], Deputy Inspector General for Evaluation and Inspections, or have your staff contact [DIRECTOR, PED] at [(AREA CODE)] [(TELEPHONE NUMBER)].

Attachment

[Note: If no recommendations are made in the report and the report is being issued directly in final, the last paragraph should be replaced with the following:]

This report is being issued directly in final since it contains no recommendations. You are not required to comment on the report. However, if you have any questions or comments, please call me or [NAME], Deputy Inspector General for Evaluation and Inspections, or have your staff contact [DIRECTOR, PED] at [(AREA CODE)] [(TELEPHONE NUMBER)].

Morning Report

Final Report to the IG

[USE WHITE BOND PAPER]

Morning Mail: X Yes (*) No

Title: Child Support and the Military

References: OEI-07-90-02250 **Contact:** [DIRECTOR, PED]
(AREA CODE) [TELEPHONE NUMBER]

We released a final inspection report on child support and the military. States do not collect child support payments in more than half of the military cases which we sampled. Locating absent parents is the greatest barrier to collections. The Aid to Families with Dependent Children and Medicaid programs could save a projected \$54.1 million annually by locating absent parents and establishing and enforcing court orders. We recommend that ACF provide technical support to State Child Support Enforcement offices and collaborate with the Social Security Administration to develop a better mechanism for obtaining Social Security numbers for military absent parents. The ACF, the Social Security Administration, and the Assistant Secretary for Planning and Evaluation concurred with our recommendations.

[Note: The body of the morning report generally should not exceed more than 8 - 10 lines. To achieve this standard, the findings and recommendations may have to be summarized.]

(*) Morning reports for a final report should usually be marked “Yes.”

Checklist for Submitting Reports to Headquarters for IG Approval

REPORT #/TITLE: _____

Final Report

CHECK (✓) EACH ITEM WHEN COMPLETED

- ___ 25 copies of report(s) to Washington (unstapled, no blue back cover)
- ___ 10 copies of report(s) (stapled, with blue back cover)
 - ___ Baltimore (If health care issue)
- OR
- ___ Washington (If non health care issue)
- ___ 2 camera-ready copies of report(s)
- ___ A 3-1/2" diskette containing:
 - ___ Memo to OPDIV(s)
 - ___ Letter to outside agency(ies) (If requesting agency comments)
 - ___ Morning report
- ___ A hard copy of everything on diskette
- ___ A 3-1/2" diskette containing full contents of report (cover, inside cover, text, and agency comments)
- ___ An External Distribution List
- ___ A copy of transmittals, report(s), and morning report for each review team member:
 - ___ George Grob
 - ___ Robert Brown
 - ___ Mary Beth Clarke
 - ___ Susan Burbach or Stuart Wright (Circle one)
 - ___ Program Specialist
 - ___ TSS

SUBMITTED BY: _____

DATE SUBMITTED: _____

8/6/98

APPENDIX J

INTERNAL DISTRIBUTION LIST

 **Draft** **Inspection Distribution List** **Final** 
Report Title/Number

DATE	ADDRESSES	MEMO (# copies)	REPORT (# copies)	MORNING REPORT (# copies)	CAMERA READY COPY	✓
	OPDIV/STAFFDIV: OUTSIDE AGENCY:	1 ORIGINAL FOR EACH ADDRESSEE	1 ORIGINAL FOR EACH ADDRESSEE			
	OIG/ES	1	5 (Draft) 9 (Final)	1		
OEI DISTRIBUTION (DRAFTS AND FINALS)						
	PED FILES (Franklin)	2	5		1	
	Holmes		1			
	Hyman	1	1	1		
	Rawdon		1	1		
	Region	2		1		
	PED [] Hdqtrs. [] Balt.	2	1		1	
	OAS		2			
	OI		1			
	OCIG		1			
	ASPE (Rm. 447D HHH)		2			
	ASL (Rm 416G HHH)		2			
OEI DISTRIBUTION (FINALS ONLY)						
	PARR (Judy Holtz)	1	10			
	OMP (H. Albert & C. Marziani)		2			
	ASPE / PIC (Rm. 438F HHH)		1			
	ASPA (Rm 647D HHH)		2			
	Dept. of Justice (Shelly Slade) *		1			

* Address: DOJ/Health Care Fraud Coordinator, Commercial Litigation Branch
601 D Street, NW, Rm 9030; Washington, DC 20530

Revised 03/30/98

EXTERNAL DISTRIBUTION LIST

ASSOCIATION/ADVOCACY GROUPS

Checklist

___ The attached report will not be distributed to any associations/advocacy groups.

___ The attached report will be distributed to the following after signature:

Report Title:

-
- ___ American Association of Homes and Services for the Aging
 - ___ American Association of Retired Persons (AARP)
 - ___ American Clinical Laboratory Association (ACLA)*
 - ___ American Health Care Association
 - ___ American Hospital Association (AHA)*
 - ___ American Medical Association (AMA)*
 - ___ American Medical Directors Association*
 - ___ American Public Health Association (APHA)
 - ___ American Public Human Services Association (APHSA) formerly (APWA)
 - ___ Association of American Medical Colleges*
 - ___ Association of American Universities
 - ___ Children's Defense Fund
 - ___ Council of State Governments
 - ___ Council on Government Relations (COGR)
 - ___ Health Industry Distributors Association (HIDA)*
 - ___ Health Industry Manufacturers Association (HIMA)
 - ___ Health Insurance Association of America (HIAA)
 - ___ Hospice Association of America
 - ___ National Association of Attorneys General (MCFU reps)*
 - ___ National Association of College and University Business Offices (NACUBO)
 - ___ National Association of Home Care*
 - ___ National Association of Medical Equipment Services*
 - ___ National Conference of State Legislatures
 - ___ National Foster Parent Association
 - ___ National Governors Association
 - ___ National Head Start Association
 - ___ National Health Care Anti-Fraud Association
 - ___ National Health Care Association
 - ___ National Hospice Association
 - ___ National Medical Association*
 - ___ Pharmaceutical Manufacturers Association (PMA)*
 - ___ Public Citizen Health Research Group

Other: _____

Component: _____

By: _____

(initial of DIG or Acting)

* Organizations which have met or are scheduled to meet with the IG.

Rev. 7/17/98

APPENDIX K

Speeches to External Groups

Major National or Widely-Recognized Groups Routinely Addressed by the OIG

- American Association of Retired Persons (AARP)
- American Bar Association (ABA)
- American Clinical Laboratory Association (ACLA)
- American Evaluation Association (AEA)
- American Hospital Association (AHA)
- American Institute of Certified Public Accountants (AICPA)
- American Medical Association (AMA)
- American Public Health Association (APHA)
- American Public Human Services Association (APHSA) formerly (APWA)
- American Society for Public Administration (ASPA)
- Association of American Medical Colleges
- Association of American Universities
- Association of Government Accountants (AGA)
- Brookings Institute Monthly Accountants Roundtable
- Children's Defense Fund
- Council of State Governments
- Council on Government Relations (COGR)
- Federal Bar Association (FBA)
- Federal Law Enforcement Officers Association (FLEOA)
- Health Industry Distributors Association (HIDA)
- Health Industry Manufacturers Association (HIMA)
- Health Insurance Association of America (HIAA)
- Healthcare Financial Management Association (HFMA)
- Institute of Internal Auditors (IIA)
- National Academy of Public Administration (NAPA)
- National Association of Attorneys General (NAAG)
- National Association of College and University Business Officers (NACUBO)
- National Association of Home Care
- National Association of Medicaid Fraud Control Units (NAMFCU)
- National Association of Medical Equipment Services (NAMES)
- National Bar Association
- National Conference of State Legislatures
- National Foster Parent Association
- National Governors Association
- National Head Start Association
- National Health Care Anti-Fraud Association (NHCAA)
- National Health Lawyers Association (NHLA)
- National Medical Association (NMA)
- Pharmaceutical Research and Manufacturers of America (PhRMA)
- Practicing Law Institute (PLI)
- Public Citizen Health Research Group

OIG CLEARANCE FORM FOR EXTERNAL SPEECHES

TO: Deputy Inspector General for Management and Policy

SUBJECT: Request for Approval to Present an External Speech

NAME OF ORGANIZATION TO BE ADDRESSED:

STATUS OF ORGANIZATION:

☐ Not-for-Profit Organization

☐ For-Profit Organization

DESCRIBE NATURE OF SPEECH:

DATE, TIME AND LOCATION OF SPEECH:

ESTIMATED SIZE AND COMPOSITION OF AUDIENCE:

ADDITIONAL INFORMATION (e.g., outside reimbursement) (OPTIONAL):

SIGN-OFFS:

REQUESTING EMPLOYEE

- OIG Component

- Telephone Number

DIRECT SUPERVISOR

DEPUTY INSPECTOR GENERAL

APPENDIX L

Work Paper Forms

WORK PAPER FILE CHECKLIST

Inspection Name: _____

Inspection Number: OEI-_____

Project Leader: _____

Note: It is recognized that not all of the items on this checklist will be applicable to each inspection OEI conducts. If an item does not apply, such as a Design Conference, or a Story Conference, note this fact by writing N/A next to the box on the Checklist.

GENERAL --AT THE START OF THE INSPECTION

G The Primary File has been set up and the six sections are labeled.

1. P-1--TABLE OF CONTENTS

G P-1-A The Checklist.

G P-1-B Table of Contents for the Primary File(s) and all Secondary Files.

G P-1-C The computer diskette(s).

G P-1-D The names and areas of responsibility of OEI regional office and Headquarters' staff involved in the inspection.

G P-1-E The Inspection Schedule form, signed by the RIG or DRIG.

2. P-2--RESEARCH AND PREINSPECTION

G P-2-A The work plan reference.

G P-2-B The research paper or other basis for the inspection.

G P-2-C Selected background materials.

G P-2-D Selected correspondence.

G P-2-E The "Table of Contents" for "Research and Preinspection" Secondary Files are included in the "Research and Preinspection" section of the Primary File and in the master Table of Contents (File P-1-B).

3. P-3--INSPECTION DESIGN

- G P-3-A** The final inspection design and transmittal letter have been placed in the “Inspection Design” section of the Primary File.
- G P-3-B** The minutes or notes from the Design Conference, a list of the participants with their office telephone numbers, and related correspondence have been placed in the “Inspection Design” section of the Primary File.
- G P-3-C** A copy of the final Data-Collection Instrument(s) used.
- G P-3-D** A description of the statistical methodology used.
- G P-3-E** The sampling plan used.
- G P-3-F** A description of the computer systems accessed and methods used to access these systems.
- G P-3-G** Documentation of training conducted to prepare the inspection team for field work, telephone surveying, or other data collection activities, and the data analysis, including a synopsis of the materials covered and a list of the participants.
- G P-3-H** The “Table of Contents” for “Inspection Design” Secondary Files are included in the “Inspection Design” section of the Primary File and in the master Table of Contents (File P-1-B).

4. P-4--DATA AND ANALYSIS

- G P-4-A** A copy of the minutes or notes from the Entrance Conference, including a list of participants and their office telephone numbers has been placed in the “Data and Analysis” section of the Primary File.
- G P-4-B** A copy of the minutes or notes from the Exit Conference, including a list of participants and their office telephone numbers has been placed in the “Data and Analysis” section of the Primary File.
- G P-4-C** Summaries of the Interviews conducted and recorded in Data-Collection Instruments has been placed in the “Data and Analysis” section of the Primary File.
- G P-4-D** A listing of the sites visited has been placed in the “Data and Analysis” section of the Primary File.
- G P-4-E** Summaries of the data analysis has been placed in the “Data and Analysis” section of the Primary File.

G P-4-F A description of the data analysis procedures, including those used in accessing and downloading data on mainframe computer systems, and a copy of the computer diskette with a list of files used for this analysis has been placed in the “Data and Analysis” section of the Primary File.

G P-4-G The “Table of Contents” for “Data and Analysis” Secondary Files are included in the “Data and Analysis” section of the Primary File and in the master Table of Contents (File P-1-B).

5. P-5--REPORTS

G P-5-A Story conference documentation, including a list of the participants has been placed in the “Reports” section of the Primary File.

G P-5-B A copy of the final draft report and transmittal memoranda has been placed in the “Reports” section of the Primary File.

G P-5-C A copy of the comments to the final draft report from any organization outside of the regional office and the disposition of those comments has been placed in the “Reports” section of the Primary File.

G P-5-D The Internal Distribution List for the final draft report has been placed in the “Reports” section of the Primary File.

G P-5-E Supporting material for facts presented in the final report, (this can be abbreviated documents containing the specific statement or fact, which then is cross referenced to the entire document) has been placed in the “Reports” section of the Primary File.

G P-5-F Cross-referenced copy of the final report or cross-reference narrative summary to show the source for all statements, quotations and facts contained in the report;

G P-5-G A Copy of the final report and transmittal memoranda has been placed in the “Reports” section of the Primary File.

G P-5-H The Internal and External Distribution Lists for the final draft report has been placed in the “Reports” section of the Primary File.

G P-5-I Briefing/Presentation materials used in the Story Conference, Exit Conference, and for other briefings has been placed in the “Reports” section of the Primary File.

G P-5-J The “Table of Contents” for “Reports” Secondary Files are included in the “Reports” section of the Primary File and in the master Table of Contents (File P-1-B).

6. P-6--FOLLOW UP

- G P-6-A** Correspondence and other material regarding the technical follow-up to the recommendations has been placed in the “Follow up” section of the Primary File. In addition, documentation of other actions such as participation in meetings to present findings and recommendations or Freedom of Information Act requests has been placed in the “Follow up” section of the Primary File. These materials include an OPDIV/STAFFDIV’s responses to our findings and recommendations and our disposition of those responses.
- G P-6-B** The “Table of Contents” for “Follow Up” Secondary Files are included in the “Follow Up” section of the Primary File and in the master Table of Contents (File P-1-B).

SECONDARY FILES

- G** Copies of materials that are too bulky for inclusion in the Primary File have been placed in the appropriate section(s) of the Secondary File(s). Table of Contents have been prepared for each secondary file section and copies of these Table of Contents have been files in the corresponding Table of Contents section(s) of the Primary File and in the master Table of Contents (File P-1-B).
- G** The outside of the box(es) or folder(s) used for the Secondary File(s) have been labeled with the name and number of the inspection.

I certify that I have reviewed the work paper file and it meets all HHS/OS/OIG/OEI requirements.

Signed: _____

Title: _____

Date: _____

OEI WORK PAPER FILE SYSTEM (PRIMARY FILES)

TABLE OF CONTENTS

PRIMARY FILE(S)

Title _____
Number _____

[illegible]

Description of Material--Page	Box No.	File No.	Ref No.	Physical Location
P-1--TABLE OF CONTENTS	P-1	P-1		
<i>Work Paper File Checklist</i>	<i>P-1</i>	<i>P-1-A</i>		
<i>Table of Contents</i>	<i>P-1</i>	<i>P-1-B</i>		
<i>Computer Diskette(s)</i>	<i>P-1</i>	<i>P-1-C</i>		
<i>Names and Areas of Responsibility of OEI Inspection Staff</i>	<i>P-1</i>	<i>P-1-D</i>		
<i>Inspection Schedule Form</i>	<i>P-1</i>	<i>P-1-E</i>		
P-2--RESEARCH AND PREINSPECTION	P-1	P-2		
<i>Work Plan Reference</i>	<i>P-1</i>	<i>P-2-A</i>		
<i>Research Paper or other basis for the Inspection</i>	<i>P-1</i>	<i>P-2-B</i>		
<i>Selected Background Materials</i>	<i>P-1</i>	<i>P-2-C</i>		
<i>Selected Correspondence</i>	<i>P-1</i>	<i>P-2-D</i>		
<i>Table of Contents of Materials in Secondary File(s) relating to "Research and Preinspection Activities"</i>	<i>P-1</i>	<i>P-2-E</i>		
P-3--INSPECTION DESIGN	P-1	P-3		
<i>Final Inspection Design & Memoranda</i>	<i>P-1</i>	<i>P-3-A</i>		
<i>Minutes or Notes From the Design Conference, a List of Participants and Their Office Telephone Numbers</i>	<i>P-1</i>	<i>P-3-B</i>		
<i>Copies of Data-Collection Instrument(s) Used</i>	<i>P-1</i>	<i>P-3-C</i>		
<i>A Description of the Statistical Methodology Used</i>	<i>P-1</i>	<i>P-3-D</i>		
<i>The Sampling Plan Used</i>	<i>P-1</i>	<i>P-3-E</i>		
<i>A Description of the Computer Systems Accessed and Methods Used to Access These Systems</i>	<i>P-1</i>	<i>P-3-F</i>		

Description of Material--Page	Box No.	File No.	Ref No.	Physical Location
<i>Documentation of Training Conducted to Prepare the Inspection Team for Field Work, Telephone Surveying, or other Data-Collection activities, and the Data Analysis, Including a Synopsis of the Materials Covered and a List of the Participants</i>	<i>P-1</i>	<i>P-3-G</i>		
<i>Table of Contents of Materials in Secondary File(s) Relating to "Inspection Design"</i>	<i>P-1</i>	<i>P-3-H</i>		
P-4--DATA AND ANALYSIS	P-1	P-4		
<i>Minutes or Notes From the Entrance Conference Including a List of Participants and Their Office Telephone Numbers</i>	<i>P-1</i>	<i>P-4-A</i>		
<i>Minutes or Notes From the Exit Conference Including a List of Participants and Their Office Telephone Numbers</i>	<i>P-1</i>	<i>P-4-B</i>		
<i>Summaries of Interviews Conducted and Recorded in the Data-Collection Instruments</i>	<i>P-1</i>	<i>P-4-C</i>		
<i>Listing of Sites Visited</i>	<i>P-1</i>	<i>P-4-D</i>		
<i>Summary of Data Analysis</i>	<i>P-1</i>	<i>P-4-E</i>		
<i>Description of Data Analysis Procedures, Including Those Used in Accessing and Downloading Data on Mainframe Computer Systems, and a Copy of the Computer Diskette(s) with a List of Files Used for this Analysis</i>	<i>P-1</i>	<i>P-4-F</i>		
<i>Table of Contents of Materials in Secondary File(s) relating to "Data and Analysis" activities</i>	<i>P-1</i>	<i>P-4-G</i>		
P-5--REPORT	P-1	P-5		
<i>Story Conference Documentation, Including a list of the Participants</i>	<i>P-1</i>	<i>P-5-A</i>		

Description of Material--Page	Box No.	File No.	Ref No.	Physical Location
<i>A Copy of the Final Draft Report and Transmittal Memoranda</i>	<i>P-1</i>	<i>P-5-B</i>		
<i>A Copy of the Comments to the Final Draft Report From Any Organization Outside of the Regional Office and the Disposition of Those Comments</i>	<i>P-1</i>	<i>P-5-C</i>		
<i>The Internal Distribution List for the Final Draft Report</i>	<i>P-1</i>	<i>P-5-D</i>		
<i>Supporting Material for Facts Presented in the Final Report</i>	<i>P-1</i>	<i>P-5-E</i>		
<i>Cross-Referenced Copy of the Final Report or Cross-Reference Narrative Summary</i>	<i>P-1</i>	<i>P-5-F</i>		
<i>Copy of the Final Report and Transmittal Memoranda</i>	<i>P-1</i>	<i>P-5-G</i>		
<i>The Internal and External Distribution List for the Final Report</i>	<i>P-1</i>	<i>P-5-H</i>		
<i>Briefing/Presentation Materials Used in the Story Conference, Exit Conference and for Other Briefings</i>	<i>P-1</i>	<i>P-5-I</i>		
<i>Table of Contents of Materials in Secondary File(s) Relating to "Report" Activities</i>	<i>P-1</i>	<i>P-5-J</i>		
P-6--FOLLOW UP	P-1	P-6		
<i>Correspondence and other material regarding the technical follow-up to the recommendations. In addition, documentation of other actions such as participation in meetings to present findings and recommendations or Freedom of Information Act requests. These materials include an OPDIV/STAFFDIV's responses to our findings and recommendations and our disposition of those responses.</i>	<i>P-1</i>	<i>P-6-A</i>		
<i>Table of Contents of Materials in Secondary File(s) Relating to "Follow up" Activities</i>	<i>P-1</i>	<i>P-6-B</i>		

OEI WORK PAPER FILE SYSTEM

TABLE OF CONTENTS

SECONDARY FILE(S)

[illegible]

OEI WORK PAPER FILE SYSTEM

INSPECTION SCHEDULE

Inspection Name: _____

Inspection Number: _____

MILESTONE	ORIGINAL PLANNED DATE	ACTUAL DATE
1. Inspection Go Ahead		
2. Start Notice Date		
3. Preinspection Begins		
4. Entrance Conference		
5. Design Conference		
6. Draft Inspection Design Report to Headquarters		
7. Final Inspection Design Report Approved		
8. Pilot Test Complete		
9. Training Completed		
10. Field Work Completed		
11. Regional Office Debriefing		
12. Analysis Completed		
13. Story Conference		
14. Exit Conference		
15. Draft Report Sent to IG for Signature		
16. Final Report Sent to IG for Signature		
17. Final Report Issued to OPDIV(s)		

I have reviewed this Inspection Schedule and everything is in order.

Signed: _____ **Title:** _____ **Date:** _____
(Signature of RIG or DRIG)